REPUBLIC OF THE MARSHALL ISLANDS

(RMI)

INDUSTRY STANDARDS

For Fish and Fishery Products and Premises

The Republic of the Marshall Islands
MARSHALL ISLANDS MARINE RESOURCE AUTHORITY
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Industry Standards

Version 1 March,25, 2020

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Endorsed by
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Endorsed by
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REGULATORY STATEMENT

These standards:

- Are issued pursuant to the Marshall Islands Marine Resources Authority Act of 1997, and the Fish Processing and the Fish Export Regulations 2020.
- May be referred to as Industry Standards.
- Apply to operators of fish processing establishments and applicants for licences in respect of fish processing establishments and landing sites, transporters, ice plants, cool stores and vessels with product destined for the European Union (EU).
- This Industry Standards also apply to non-EU market operators, where requirements and gaps exist in the Schedule 3: Export Standards of the Fish Processing and Export Regulation.

Amendment Sheet:

Section Title	Page/s	Amendment date	Version No.	Details of amendment	Approval

SECTION 1: GENERAL

1.1 General Terms

The following terms shall be considered when reading this Standard:

1.1.1 Authority

Throughout this Standard, the Authority refers to Director and the Marshall Island Marine Resource Authority and or the authority for the implementing of the fish/food safety, verification and certification aspects of that Authority.

1.1.2 Alternative Standards

In situation where these Standards do not cover a specific requirement, but which becomes a requirement from importing country and/or fitness for purpose needs, MIMRA as the CA reserve the right to adopt the principles of any of the following international standards without the need to amend these Standards:

a) **Fish and Fishery Product standards and codes of practice Volume 9 of the Codex Alimentarius, Fish and Fishery Products Standards**
b) **USFDA Low Acid Canned Foods Code Federal Regulation Title 21 Chapter 113**

1.1.3 Legislation

Where legislation is referenced throughout these Standard it should be noted that the requirements includes the title of the primary legislation and secondary legislation and any subsequent amendments.

1.2 Legislation

1.2.1 Title 51- Marine Resource Code - Marine Resources Act 1997 (Primary)

The Marine Resource Act, Fisheries Act and subsequent Legislation relevant to this standard provides for:

a. The controls on licensing local and foreign flagged vessels fishing vessels
b. The controls on licensing fish processing establishments
c. The powers of authorised officers (in general all officers licensed under the Act)
d. The offences relating to authorised officers and observers
e. The setting of fees, charges and levies.
f. The penalties pursuant to the breach of the license conditions
g. Powers to make regulations, set standards
h. Setting out powers to regulate the processing, marketing, certification and export of fish and fishery products.
i. The duties of the Fish Processing Establishments and Operators
j. The provision of powers of entry and search of any place believed to be in breach of the requirements of RMI legislation
k. The seizure and confiscation of fish and fish products.

1.2.2 The Fish Processing and Export Regulations 2020.

1.2.2.1 Subject to Title 51 of the Marine Resource code, these Regulation enables;

a) the regulation of the commercial processing of fish and fish products,
b) the commercial export of such fish and fish products,
c) prohibits the commercial processing and export of fish and fish products without authorization from the Authority
d) the setting of standards for the processing and exports of fish and or establishment and related activities.
e) provides for an application process for licenses to conduct such activities;
f) provides for the appointment of fish inspectors
g) provides offenses for the violation of the Regulation;
h) and prescribes the penalties.

1.2.3 Food Safety Act and Environmental Protection Act

Subject to the above legislations' exporters will adhere to requirements pertaining to manufacture and domestic trade where public health is concern and meeting certain requirements under local legislations.
The operator must make it his or her business to understand the requirements of those legislations. Operator may be subjected to these laws when required by the RMI Authorities

1.3 Application

1.3.1 The Industry Standards (ISs) outline requirements to be met at an operational level by fish processing establishments, vessels and other activities requiring controls.

1.3.2 These Industry Standards are intended to provide further detail to legislation and provide an auditable standard for both CA and industry personnel alike.

1.3.3 Facilities that are not in substantial compliance with the *Fish Processing and Export Regulation* 2020 and the requirement of the ISs may not be permitted to export seafood products from RMI in particular those intending to export to the European Union.

1.3.4 This Standards sets additional European Union requirements for:

a. Ice plants
b. Cold Stores
c. Offshore vessels
d. Coastal vessels
e. Landing sites
f. Transporters

1.4 Interpretation

Approved	Approved by the Director.
Batch	A number of lots from the same facility submitted for inspection simultaneously.
Competent Authority	Marshall Island Marine Resource Authority is the competent authority for fish and fishery products, whilst the implementation function of food safety verification and certification for exports is carried out by the fish inspectors or CA officers, authorised under Tittle 51- Marine Resource code.
CAA	The Competent Authority Advisor is responsible for the overall implementation function of fish/food safety verification and certification for exports and reports to MIMRA Director and the Board.
CAO	Competent Authority Officer, a fish inspector authorised under Title 51, Marine Resource Code to carry out the regulatory function of MIMRA in fish/food safety, verification and certification of exports.
Clean seawater	Sea-water that is free of excess turbidity, colour, offensive odours and other contaminating substances, and which meets other approved requirements.
Container	Includes any box, bag, can, carton, crate, jar, wrapper, packaging material used for packing fish but does not include shipping containers.
Contaminant	Any biological or chemical agent, foreign matter, or other substances not intentionally added to fish and fishery product that may compromise food safety or suitability.
Contamination	The introduction or occurrence of a contaminant in food or food environment.
Control (verb)	To take all necessary actions to ensure and maintain compliance with criteria established in a HACCP plan or support programme.
Control (noun)	the state wherein correct procedures are being followed and criteria are being met.
Control measure	any action and activity that can be used or put in place to prevent or eliminate a food safety hazard or reduce it to an acceptable level.
Control Point	any point, step or procedures at which biological, chemical or physical factors can be controlled.

Corrective Action	Any action to be taken when the results of monitoring at the Critical Control Point indicate a loss of compliance with criteria established in a HACCP plan, support programme or any other approved programme.
Critical Control Point (CCP)	– A step at which control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level.
Critical Limit	A criterion, which separates acceptability from unacceptability.
Director	of the Marshall Islands Marine Resource Authority of the Ministry of National Resources and Development
Facility	Any building or vessel or area in which food is handled, prepared and stored, including the surroundings under the control of the same management.
Fishing Vessel	Vessels which bleed, head, gut or remove fins of fish into a chilled or for preserved fish in brine or refrigerated sea water. It can also have the capacity for frozen storage for less and or more than 24 hours.
Fish	Any water dwelling, aquatic or marine animal or plant, live or dead, and includes the egg, spawn, spat and juvenile stages, and any of their parts but does not include any species of whales.
Fitness for purpose	Suitable for intended use
Flow diagram	a systematic representation of the sequence of steps or operations used in the production or manufacture of a particular food item.
Food safety	Assurance that food will not cause harm to the consumer when it is prepared or eaten according to its intended use.
Foreign matter	Any organic or inorganic matter that is not permitted in these standards, not indigenous to fish, detrimentally affects the quality of the fish or fitness for human consumption, and is included in or adheres to any part of the fish.
Good Manufacturing	Practice - Compliance with the structural and operational requirements of Sections 3 and 4 of these standards.
HACCP	Hazard Analysis Critical Control Point – a preventative measure system that identifies, evaluates, and controls hazards that are significant for food safety.
HACCP Plan	A document prepared in accordance with the principles of HACCP as defined by Codex Alimentarius Commission to ensure control of hazards that are significant for food safety in the segment of the food chain under consideration.

Hazard	A biological, chemical or physical agent in, or condition of, food which has the potential to: a) Affect food safety; or b) Cause an adverse health effect.
Hazard Analysis	The process of collecting and evaluating information on hazards and conditions leading to their presence to decide which are significant for food safety and therefore should be addressed in the HACCP Plan.
Ingredient	Any substance (including a food additive) used in the processing of fish that is included in or part of the final fish product.
Label	Any wording, tag, brand, symbol, picture, or other descriptive matter written, printed, stencilled, marked, embossed, impressed on, appearing on, attached to, or enclosed within any fish or fish product.
Lot	A quantity of fish of the same type produced under the same conditions during a particular time interval generally not exceeding 24 hours and from an identifiable processing line.
Monitor	The act of conducting a planned sequence of observations or measurements of control parameters to assess whether a CCP or other control point, is under control.
Official analysis	Analysis carried out by an approved laboratory or on behalf the CA, at an accredited laboratory.
Packing	The placement of fish into a container and includes sorting and grading.
Packaging	Any material that comes into immediate contact with the product that is intended to protect, encase, cover, enclose, contain or pack. Includes rigid materials such as cartons and containers where product is filled directly into the carton or container.

Pre-requisite programme – *See Support Programme*

Potable water	Water that is fit for human consumption as prescribed according to RMI Environmental Protection Act seen equivalent to WHO standards for drinking water
Processing	Includes dismembering, cleaning, chilling, treating, freezing, drying, smoking, cooking, canning, packing of live fish or other preservation or further processing techniques.
Refrigerated seawater	Clean seawater cooled by a suitable refrigerated system.

Sanitary design	In relation to any licensed facility, internal structure, equipment, or conveyance, means designed, constructed, and located so that it minimises the risk of contamination
Sanitise	adequate treatment of surfaces by approved processes that are effective in reducing microbial contamination to a level that will not give rise to a health hazard.
Sample unit	one container and its contents, or individual fish, drawn at random from a batch.
Shall	Denotes a mandatory requirement.
Shipping containers	those containers used to store or otherwise contain raw materials and/or finished product under conditions that will prevent deterioration
Should	Denotes a recommended or advisory procedure.
Sound	In a state that will not contribute to contamination, directly or indirectly, of a food product
Suitable	Meeting the requirements of this standard and which will contribute to food safety
Support programme	A documented system that underpins or supports a recognised HACCP plan or a recognised hazard identification and analysis process (for example a good manufacturing or good hygiene practice (GMP or GHP) programme or schedule relating to cleaning, staff training, document management or other matters). Also known as pre-requisite programme, standard operating procedure (SOP), standard sanitary operating procedure (SSOP).
Validation	Obtaining evidence that a programme (HACCP plan or other documented programme required under these standards) is complete and meets the requirements of the legislation, and when implemented, will consistently achieve the required outcomes of the programme.
Verification	The application of methods, procedures, tests and other checks, in addition to monitoring, to confirm on-going compliance with the HACCP plan and other programmes. Operator verification – activities undertaken by the company, External verification – activities carried out by an external organisation (including Fisheries Division, overseas government reviewers, and customers).

Abbreviations

CAC	Codex Alimentarius Commission
CCP	Critical Control Point
CA	Competent Authority (otherwise known as the MIMRA)
EC	European Commission
EU	European Union
FAO	Food and Agriculture Organisation
FDA	Food and Drug Administration
FVO	Authorised Fisheries Verification Officer
GMP	Good Manufacturing Practice
HACCP	Hazard Analysis Critical Control Points
IS	Industry Standards
IQF	Individually Quick Frozen
ISO	International Standards Organisation
MIMRA	Marshall Islands Marine Resource Authority
MNRD	Ministry of National Resource and Development.
MPN	Most probable number
OMAR's	Overseas Market Access Requirements
QA	Quality Assurance
QC	Quality Control
ppm	Parts per million
SCAO	Senior CA officer
US or USA	United States of America
WHO	World Health Organisation

1.5 Document Control

1.5.1 Approval

These Industry Standards (ISs) is valid only when approved by the Competent Authority, as indicated by the approval section on the front cover of this document.

1.5.2 Review

1.5.2.1 The IS will be reviewed at least annually, but more often if required.

Review may take place if one of these factors arises but is not limited to:

a. A requirement by overseas importing countries
b. Following a significant food safety occurrence
c. On request from the Director
d. Discussions in the CA of various market and industry requirements
e. The comments from the operators in response to these IS or any market requirements.

1.5.2.2 When there is a need to make alterations to any part of these ISs, the proposed change will be presented to the CA Advisor and the CA officer approval.

Request for any changes will be discussed by the CA team and record of such discussions be held on file as records.

1.5.3 Amendments

1.5.3.1 Once changes are approved the amendment sheet below is completed and the ISs updated.

Amendment Sheet:

Section Title/Clause	**Page:**	**Date of amendment**	**Reason for amendment**	**Approval**

Section 2: Export Requirements

2.1 Conditions and Restrictions

2.1.1 General

2.1.1.1 The export of fish and fish products processed in the RMI is subjected to the approval of the Fish Export License issued by the Authority, the products are handled and processed in a facility approved by the Competent Authority and have met importing countries requirements.

2.1.2 Licensing

2.1.2.1 The business operator intending to handle and process fish and fishery products for export shall make an application in an approved form to the Authority as set out in Form 1 in the *Fish Processing and Export Regulation* 2020 and or Appendix Two of the Regulation and of this Standards;
Such an application must be accompanied by:

- An adequate plan and description of the premises and process
- A license fee set by the Authority
- A copy of the HACCP plan and or supporting documents and or declaration as requested by the Authority from time to time
- Further Information as set out in Schedule 3, Section 2.2.2-2.2.3 of *the Fish Processing and Fish Export Regulation 2020* may be requested by the Authority.

2.1.3 Processing and Storage

2.1.3.1 A licensed fish processing facility shall operate:

a. In accordance with *the Fish Processing and Fish Export Regulation 2020.*
b. In accordance with these ISs for exports to the European Union.
c. In a clean and hygienic state which will not contaminate the product being handled at all times during catching, processing, packaging and transportation
d. With an effective means of fish storage to prevent deterioration
e. Under an approved HACCP plans as detailed in Section 4.6 of these standards
f. To meet importing country requirements

2.2 Licensing

2.2.1 Pre-Inspection Meeting

2.2.1.1 Before the management of an establishment start to build, rebuild or adapt an establishment, acting on their own initiative or on the initiative of the Competent Authority, the applicant may request a pre-inspection visit to discuss the requirements the operator is required to meet.

2.2.1.2 The Competent Authority may visit the establishment or meet with company representatives to view and discuss their plans in more detail.

2.2.3 Application

The business operator of an establishment proposing to prepare fish or fish products for export shall make an application on an approved Form 1 as given in Appendix Two (II).

Similarly, vessels wishing to handle fish intended for export to the EU or vessel wishing to gain CA Health Certification for their products shall make an application on an approved form as given in Appendix Two.

2.2.3.1 Such an application must be accompanied by:

- A copy of the building plans and specifications as appropriate and as detailed in sections 2.2.4 to 2.2.6 below as appropriate.
- The prescribed licence fees.
- A copy of the company's HACCP plan(s) and any supporting programmes (pre-requisite programmes or SSOPs)

2.2.4 Plans: Land based Facilities

2.2.4.1 Plans for land-based facilities shall include:

a. A locality map showing the physical boundaries of the site;

b. A site plan detail showing:
   - The layout of the entire facility including roads and all prominent features,
   - North compass point,
   - Adjoining and location of neighbours;

c. A product flow diagram and main features of product flow;

d. Detailed information on major equipment used in fish processing including refrigeration equipment and capacities;

e. A water reticulation plan including all pipe work and fittings and identification of potable and non-potable water supply as applicable;

f. Identification of any factories or other hazardous premises that may affect the safety of the fish or fish products being processed, packed or stored within or next to the radius of the facility.

2.2.5 Plans: Vessels for EU Approval

2.2.5.1 Plans for EU approved vessels shall include:

a. A schematic or layout diagram of all areas where fish are to be handled and the flow of product

b. Details of water inlets for processing water in the hull

c. Detailed information on major equipment and surfaces used in fish handling on board the vessel including refrigeration equipment and capacities;

d. Details of the ownership of the vessel and the vessel's flag.

e. Details of the registration of the vessel if licensed within RMI

2.2.6 Specifications Needed to Accompany Plans

2.2.6.1 Specifications that must accompany plans include the following details in relation to the premises or vessel to be approved:

a. Construction materials of the facility to be approved;

b. Construction materials of equipment used in fish handling;

c. Surface finishes for product contact surfaces;

d. Product or ingredient contact surfaces;

e. Details of essential services, pest control, waste storage;

f. Details of waste treatment (if any) and disposal systems for sewerage, waste water and wash water)

g. For cold stores, the method of refrigeration, capacity in kilograms and holding temperature;

h. For freezers, the method of refrigeration, capacity in kilograms, time required for a full load to reach -18°C (or -9C) from a stated initial temperature;

i. For refrigerated rooms, operating temperatures and size;

j. Where there is more than one room, tank or hold having a similar function, the rooms, tank or hold shall be individually identified;

k. Maximum number of processing personnel or crew.

l. For vessels, the type of preservation and the number and location of holds or wells.

2.2.7 Changes in Licence Details

2.2.7.1 When company information held on file by the MIMRA CA changes, for example, a change in factory or EU vessel layout, processing techniques, markets, ownership or company name, the company is to complete the application form for Amendments to Approval Details as given in Appendix Two. Additional and relevant information shall be attached to this form and submitted to the CA Advisor or to the Senior CA officer of the Marshall Islands Marine Resource Authority

2.3 Rejection of Product

2.3.1 Within the Licensed Facility

2.3.1.1 Where product is found to be unfit for human consumption within the premises of the licensed facility or an EU vessel or establishment, this product must be clearly identified and isolated until an appropriate disposition is agreed.

2.3.1.2 The operator must ensure that all actions taken are documented and held on file. This action should be brought to the attention of a CA during officer in their next visit or port call.

2.3.2 Rejection from an Importing Country or Customer

2.3.2.1 Where product is found to be unfit for human consumption anywhere from distribution, an importing country or an external customer, the operator must notify a CA inspector within 24 hours.

2.3.2.2 The affected product must be traced, identified, isolated and held pending agreement between the officer and the operator on disposition. The operator must ensure that all actions are recorded and that evidence is gathered to show actions were taken as agreed with a CA inspector within the agreed timeframe.

2.3.2.3 The operator must carry out an investigation into the cause of the problem. Corrective action must be taken to prevent recurrence of a similar problem. All such actions are to be documented and kept on file.

2.3.2.4 Penalties for not informing the authorities may include forfeiture of license if in very serious scenarios.
2.3.2.5 Companies will be expected to follow their documented and approved Product Recall procedure when an importing country or customer rejects product as unfit for human consumption.

2.3.3 Container Refrigeration Unit Malfunction

2.3.3.1 Should the operation of the refrigeration unit of a shipping container fail or malfunction during transit from RMI to any foreign port destination the following procedure is to be followed:

1. The company is to advise the CA in writing, within 24 hours of the issue, with initial details of the malfunction including (where possible):
    a. Details of the malfunction including date, time and location of the container
    b. Intended actions to be taken to rectify the situation
    c. Condition of the product

2. Within 1 week of this advice the company is to provide the following information:
    a. Copies of the container automatic temperature recording chart showing container air temperatures up until the time of malfunction.
    b. Photos of the product being loaded into the new container
    c. Confirmation of product temperatures both on the day of the malfunction and temperatures once placed in the new operational container.
    d. At least 30 product temperatures evenly spread across the front, back and middle of the container shall be taken per container.
    e. At least 9 histamine test results with samples evenly distributed across the front, back and middle of the container and tested using an ISO 17025 accredited, independent laboratory.
    f. In order to gain a new health certificate from the CA, test results must confirm that the histamine levels are acceptable to both the receiving market and according to RMI Industry Standards.
    g. Confirmation of seal number and container number in which the product will be placed to rectify the situation.
    h. A report detailing all actions taken to rectify the situation and maintain the integrity of the product. This should include:
        - Dates and times of malfunction, date product is moved to another container or storage awaiting container repair and, date the problem is rectified, and
        - Sufficient information to back up the condition of the product, and
        - A conclusion as to product “fitness for purpose” following analysis of the histamine test results, and
        - A decision on the recommended disposition of the product.
    i. Any other information requested by the CA

3. The CA will consider the information and provide the response. Upon satisfactory evaluation the CA will issue a new certificate for the product that is to be sent on to its final destination.

4. The CA must follow the procedure in the National Control & Export Protocol for the issuance of a replacement certificate.

5. The CA will provide a summary report for file purposes covering:
   a. Actions they have taken, and
   b. Decisions made, and
   c. The final outcome of the investigation
   d. Any notes or other evidence kept or gathered during the course of the investigation.

6. Please note:
   a. The cost of histamine and other testing is to be covered by the company concerned and NOT the Competent Authority.
   b. The CA reserves the right to elect to visit the location of the affected product and sight the product in situations where they believe the information provided is incorrect or incomplete. The cost of CA travel and associated costs to be covered by the company concerned.

2.4 Export Clearance

2.4.1 General

2.4.1.1 Any persons seeking to export must meet the requirements of these standards. Furthermore, those intending to export to the European Union shall only export if they have been approved and meet the requirements given in Appendix 5.

2.4.2 Loading for Export

2.4.2.1 Loading for export shall take place in accordance with the following:

- Where fish is being loaded for export, whether into a container, the hold of a ship or an aircraft, or otherwise, a CA officer shall be afforded a reasonable opportunity to inspect the loading of the fish, and
- Any person involved in the loading operations shall assist the CA Officer in this inspection

2.4.2.1 For markets requiring a seal to be placed on containers prior to shipment, a CA will ensure seals are placed securely on containers and seal numbers recorded.

2.4.3 Refusal to Issue Certificate/Re-examination of Fish

2.4.3.1 In situations where an operator fails to meet the requirements of these Standards, the CA officer may refuse to issue an export or health certificate (refer section 5.5). Alternatively, the CA Officer may request to inspect or examine the fish and/or take samples for testing.

2.5 CA Inspection and Auditing

2.5.1 General

2.5.1.1 All facilities wishing to export fish or fish product must be audited by a CA officer as prescribed in this standard. Failure to undergo audits according to these standards will result in penalties.

2.5.1.2 This section details audit protocols to be followed when auditing a licensed facility's ability to ensure the following:

a. Structural and operational requirements of these standards are met;
b. Compliance with documented and approved HACCP plans;
c. Corrective actions are being followed and allow for the production of safe food;
d. Any relevant overseas market access requirements are met.

2.5.2 Documentation Requirements

2.5.2.1 Documents required by these standards shall be controlled and held on file by the operator. Such documentation shall be made readily available to any CA officer or other authorised personnel within 24 hours of the request.

2.5.3 Risk Categorisation and Frequency of inspections

2.5.3.1 The type of product risk will determine for facility and verification frequency.

Risk Category	**Extent of Risk**	**Fishery Product examples**
High Risk	Significant potential to put at risk vulnerable groups (elderly, infants, immuno-suppressed) or large numbers of consumers.	Production of ready to eat foods; bivalve shellfish, cooked shrimps, smoked or modified atmosphere fish, canned fish, frozen and fresh raw fish implicated with histamine production.
Medium Risk	Reduced potential to put vulnerable groups at risk, where the distribution may be limited of where the product is to be fully cooked before consumption.	Frozen fish fillets (non- histamine producers) from aquaculture or fresh sources. Reef fish associated with ciguatoxin
Low Risk	Only a minimal potential to harm consumers	Frozen fish fillets and cephalopods (non-histamine producers) from marine sources to be fully cooked before consumption. Dried fish and fishery products, Live fish and crustaceans to be fully cooked.

2.5.3.2 Processing Establishments and Cool-stores

2.5.3.2.1 At the end of an audit or inspection audit the overall results should be compiled based on the sum of deficiencies in each category. The following tables show how the number and nature of the non-conformities in each category can be used to establish an overall rating for the level of risk.

Table 2 – Facility and Non-conformance Classification & Inspection Frequency

Classification/ Status	**Number of minor deficiencies**	**Number of major deficiencies**	**Number of serious deficiencies**	**Number of critical deficiencies**	**Next Inspection Frequency**
A (Very Good)	0 to 6	0 to 5	0	0	Every 3 months
B (Good)	7 or more	6 to 10	1-2	0	Every 1-2 months
C (Average)	NA	11 or more	3 to 4	0	Every 1-2 weeks
D (Fail)	NA	NA	5 or more	1	Each processing or other day until rectified

2.5.3.1.2 Should a company not be processing on the date a verification visit is scheduled, the company must advise the CA of the date of their next processing day when the CA verification visit shall be completed.

2.5.3.2 EU Vessels

2.5.3.2.1 At the end of the audit the overall results should be compiled based on the sum of deficiencies in each category. The following tables show how the number and nature of the non-conformities in each category can be used to establish an overall rating for the level of risk.

Table 2 - Rating of EU Vessels

Rating of the Vessel	Frequency of Next Visit	Number of minor deficiencies	Number of major deficiencies	Number of serious deficiencies	Number of critical deficiencies
A	The 1st unload after 6 months days +/- 10 days.	0 to 6	0 to 5	0	0
B	The 1st unload after 3-month days +/- 10 days.	7 or more	6 to 10	1 to 2	0
C	The 1st unload after 1-month days +/- 5 days.	NA	11 or more	3 to 4	0
D (not approved)	Each port call	NA	NA	5 or more	1

2.5.3.3 Landing Sites, Ice Plants or Transporters (EU only)

2.5.3.3.1 The frequency of visits will be set on a 3-monthly basis with variation dependent on the outcome of each inspection. Follow-up visits will be conducted as spot visits to confirm that non-compliance from previous verifications have been effectively and adequately corrected.

2.5.3.4 New Operators

2.5.3.4.1 Any new operators (whether it be land-based premises or EU vessels, cool stores, landing sites, ice plants or transporters, inspections will commence at the most frequent visit and future frequencies will be dependent on the outcome of the initial inspection as given in the previous tables.

2.5.3.4.2 Land-based establishments listed on the approved internal establishments list will be required to meet the requirements of this Standard EXCEPT EU specific requirements. Where the CA deems the requirements to be essential to prevent food safety illness, the CA can impose additional requirements of this Industry Standards. Other importing country requirements are considered.

2.5.3.4.3 Establishments listed on the external list for export to the EU will be required to meet the requirements of these Standards including the requirements given in Appendix Five. Operators of establishments must formally apply to the CA in writing for removal from the EU exporters list before they can cease compliance with these written procedures.

2.5.3.5 HACCP Plan, SSOP/GMP and Infrastructure Reviews (Forms F01/01A, F02, FO3)

2..5.3.5.1 These are to be completed before a premise commences operation and again when changes are made.

2.5.3.6 Suppliers to EU exporters

2.5.3.6.1 The frequency of regulatory verification for establishments in full compliance will be fixed at two annual visits.

2.5.3.6.2 Time granted for completion of corrective actions or suspension of EU supplier status will be decided on case-by-case basis.

2.5.3.7 Traceability Checks

2.5.3.7.1 The frequency of checks on traceability should be at least bi-annually for exporters of fishery products.

2.5.3.8 Organoleptic Checks (EU only)

2.5.3.8.1 The frequency of organoleptic checks should be at least four a year for exporters of fishery products to the EU.

2.5.3.9 Parasite Checks (EU only)

2.5.3.9.1 The frequency of parasite checks should be at least four times a year for exporters of fishery products to the EU.

2.5.4 CORRECTIVE ACTIONS

2.5.4.1 Whenever a deficiency is noted as a result of a CA officers audit, the officer will discuss each deficiency with the operator (or his or her representative) prior to leaving the premises. In discussing each deficiency, the officer and the operator shall agree on actions to be taken and timeframes allowed to rectify the deficiency.

2.5.4.2 The CA Officer will then complete a corrective action form as shown in Appendix Six and return this with the completed audit report.

Section 3: Design and Construction

3.1 Site and Layout

3.1.1 Location

3.1.1.1 The licensed facility shall be sited so that neighbouring buildings, operations or land-use present no source of potential contamination for the hygienic operation of the facility. It shall also be located in an area away from objectionable odours, smoke, dust, other contaminants, chemical plants and flooding.

3.1.2 Surrounds

3.1.2.1 Immediately surrounding buildings, roads, pathways and other areas serving the licensed facility shall be kept clean and tidy at all times and be suitably paved, graded, grassed, or landscaped to avoid the risk of dust, pests or other contaminants from entering food handling and storage areas.

3.1.2.2 Product load in or load out areas shall be suitably covered to protect the product from dust and environmental exposure (sun, rain, etc.) in situations where the product is unpackaged. There shall be adequate drainage of the surrounds including roads, access ways and pathways and provision shall be made to allow for their cleaning. Where vehicles are cleaned on the premises a paved and drained area shall be provided for this purpose.

3.1.2.3The processing facility and associated amenities and storage areas shall be adequately separated from other parts of the building that are not directly associated with fish processing or packing. Separation may be by wall, ceiling or self-closing door.

3.1.2.4 Guard dogs shall not be used unless there is no risk of contamination to the establishment and/or product.

3.1.2.5 If the plants' grounds are bordered by property not under the operator's control and not maintained in the manner described in this section, extra care shall be taken to inspect, exterminate or other methods to exclude pests, dirt and filth that may be a source of food contamination.

3.1.3 Layout

3.1.3.1 Layout of factory precludes contamination and provides adequate working area. There should be separation by walls, physical separation or other effective means to separate:

a) between clean and dirty areas

b) between dry and wet areas

c) between hot and cold areas

d) between areas that may cause contamination to the product being processed.

3.1.3.2 The layout shall be such that equipment and processing activities facilitates the rapid processing of fish and that fish is not exposed to unnecessary contamination and delays at any point in the process.

3.1.3.3 All possible preventative measures and provisions must be taken during design and construction:

i) to avoid cross-contamination during production between final and raw products;

ii) to minimize the risk of food contamination by contact surfaces, packing materials, offal, drainage systems etc.;

iii) to minimize maintenance;

iv) to facilitate cleaning and disinfection;

v) to build in the passive pest-control systems;

vi) to minimize airborne contamination;

vii) to guarantee safety and a healthy work environment to workers.

viii) to provide adequate working space to allow for satisfactory performance of all operations connected with the preparation and or processing of food;

ix) to dispose of all liquid and solid waste, storm-water and sewerage;

x) to install an adequate potable water supply; it may be necessary to install an in-plant chlorination system to ensure the potability of water at all times

xi) to install an adequate electrical supply to maintain normal and efficient operation of all electrically powered equipment and lighting

xii) to ensure that:

- product flow takes place from dirty areas to clean areas (raw final with no cross over)
- drains flow from clean to dirty areas, away from clean to dirty areas, away from food handling areas
- airflow is directed from clean to dirty areas.

xiii) to avoid dripping or condensation from fixtures, ducts, pipes and ceilings that can contaminate food, food-contact surfaces or food packing materials.

3.2 Reception Area

3.2.1 The receiving area should be kept clean and in good repair to prevent contamination.

3.2.2 The floors, walls and ceiling should be made of materials that are easy to clean.

3.2.3 There should be adequate supply of potable water and the area should be adequately separated from the outside environs to prevent contamination.

3.3 Plant and Equipment to be of Sanitary Design

3.3.1 Buildings and Facilities

3.3.1.1 Buildings and facilities shall be of **sound construction and maintained in good repair.** All construction materials shall be of a type that will not transmit any undesirable substances to the food.

3.3.1.2 Adequate **working space** shall be provided to allow for satisfactory performance of all operations connected with the preparation of food.

3.3.1.3 The design of buildings and facilities shall permit **easy and adequate cleaning** to allow the hygienic preparation of food.

3.3.1.4 Buildings and facilities shall be designed to **prevent the entrance** and harbourage of pests and contaminants.

3.3.1.5 Buildings and facilities shall be designed to **provide separation** by partition, location or other effective means between operations (including waste disposal), which may cause cross contamination of food.

> ***Note**: To meet this requirement the following areas namely, areas for processing by-products, offices, engineering workshop, equipment, spare parts store, canteen and garages shall be separate from areas handling fish.*

3.3.1.6 Buildings and facilities shall be **designed** to facilitate hygienic production, by means of an orderly flow of ingredients, food, packaging, and removal of waste products in the preparation process, from the arrival of the raw materials at the licensed facility through to the final product. Crossover in production between final and raw product shall be avoided.

3.3.1.7 Areas where raw materials are **received or stored** shall be separated from areas in which final product preparation or packing is conducted to prevent contamination of the final product. Areas and compartments used for storage, manufacture or handling of edible products shall be separated and distinct from those used for inedible materials.

3.3.1.8 The main processing area in which fish is handled should have only one entrance for personnel being independent and separate from any entrances and exits used for raw materials, finished products and other materials used during processing.

3.3.1.9 An adequate potable **water supply** shall be made available. Where necessary an in-house treatment system should be installed to ensure the potability of water at all times.

3.3.1.10 The **electrical supply** shall be adequate to maintain normal and efficient operation of all electrically powered equipment and lighting.

3.3.1.11 Provision shall be made for all **liquid and solid waste** to be disposed of hygienically. Wastes shall be disposed in a way that cannot contaminate water and food supplies and cannot offer harbourage or breeding places for rodents, insects or other vermin.

3.3.1.12 **Drainage** facilities shall include:

a. Disposal of processing and sewerage effluent; storm-water and site drainage; and

b. Shall be large enough to carry peak loads and constructed to avoid contamination of potable water supplies.

3.3.2 Food handling Areas

3.3.2.1 General Requirements

3.3.2.1.1 Areas handling and processing fish shall be designed and constructed to:

a. Allow efficient handling of the product;

b. Be separated by partition, location or other effective means so that operations will not cause cross-contamination of food or food handling surfaces;

c. Provide separate storage of raw material, final product and waste processing material;

d. Protect raw material and final product from risk of contamination;

e. Prevent product deterioration due to exposure.

3.3.2.1.2 Facilities shall be designed so that:

a. Product flow takes place from dirty areas to clean areas (raw to final with no cross over);

b. All areas and equipment are easily accessible for inspection and cleaning.

3.3.2.2 Ceilings

3.3.2.2.1 Ceilings shall be designed, constructed, sealed and finished so as to:

a. Provide appropriate height in all rooms where fish is handled;

b. Be lightly coloured, smooth and impervious to moisture;

c. Where sheeting is used, joints to be sealed so that they are impervious to moisture;

d. Prevent dirt accumulating and be capable of being effectively cleaned;

e. Have all overhead machinery and pipes located above ceiling unless covered by a regular and effective cleaning regime

f. Minimise condensation, mould development and flaking.

3.3.2.2.2 In buildings where the roof frame is exposed; the installation of a suspended ceiling should be considered. Otherwise all parts of the structure must be smooth and painted a light colour. There should be easy access to all parts of the roof structure to facilitate cleaning.

3.2.2.3 Floors

3.2.2.3.1 Floors shall be constructed of dense waterproof concrete or another impact resistant impervious surface that has a smooth, non-slip finish and is easily cleaned. The floor must be constructed so that it slopes towards drains (as a guide a minimum slope of 1:50 is recommended) and does not allow pooling. If pooling of water occurs companies must ensure this is squeegeed away at regular intervals.

3.2.2.3.2 All floor joints shall be:

a. Sealed with impervious materials;
b. Finished flush with the surface.

3.2.2.3.3 Junctions between the floor and walls shall be adequately coved to facilitate cleaning.

3.2.2.4 Floor Drains

3.2.2.4.1 In any area that involves “wet" operations:

a. Floors shall be sufficiently graded (at least 1:100 gradient) for liquids to drain to trapped outlets;
b. Floor drains shall be adequate in size, number and located to cope with the maximum flow of water under normal working conditions.

3.2.2.4.2 All drains shall:

a. Be effectively sealed by a trap or similar device;
b. Have adequate access for cleaning;
c. Where necessary, be adequately vented to the exterior of the building.
d. Be rodent proof.
e. Be covered with suitable removable grills or covers.
f. Allow the rapid removal of all liquid wastes arising from all processing operations
g. Be able to cope with the maximum flow of water under normal working conditions but also to carry peak loads.
h. Prevent the return of gases and odours from the drainage system

3.2.2.4.3 Solid traps installed in conjunction with floor drains shall be designed to enable adequate cleaning.

3.2.2.4.4 Where necessary back flow preventers should be fitted to prevent the back flow of water from an undesirable source.

3.3.3.4.5 Drains shall flow away from food handling areas.

3.2.2.5 Internal Walls and Partitions

3.2.2.5.1 Internal walls and partitions shall:

a. Be constructed of water-proof, non-absorbent and washable materials;
b. Be smooth, lightly coloured and free from gaps;
c. Have all joints sealed that might allow the ingress of water, pests or contaminants;
d. Be impact resistant or protected from impact;
e. Be easy to clean and disinfect.

3.2.2.5.2 In areas where “wet” operations are carried out, angles between walls and floors shall be sealed and coved to facilitate cleaning unless adequate cleaning and sanitising can be demonstrated without the need for coving.

3.2.2.5.3 Where walls do not touch the ceiling, their tops shall be capped at approximately 45 degrees.

3.2.2.5.4 Where internal walls are painted or surface coated, the surface shall:

a. Be non-toxic;
b. Withstand hosing with hot water and detergents;
c. Withstand reasonable impact.

3.2.2.5.4 If any room (including a cold store) is built within a food handling room, inaccessible cavities formed between the walls or ceilings of the inner and outer rooms shall be made pest and dust proof.

3.2.2.4.5 Any piping or tubing should be located either within the wall or fixed at least 4 cm from the wall, in order to permit easy cleaning behind.

3.2.2.6 Windows, Doors, Hatches, Vents and Internal Walls

3.2.2.6.1 All external and ventilation openings shall be proofed against the entry of pests.

3.2.2.6.2 Windows that open to the outside are not permitted in areas where food is exposed, processed or packed.

3.2.2.6.3 Open-able windows and vents shall be fitted with insect-proof screens kept in good repair that are easily removed for cleaning. Such screens shall have a mesh of no more than 1 mm.

3.2.2.6.4 Doors and hatches shall:

a. Have smooth and non-absorbent surfaces;
b. Be close fitting;
c. Be impact resistant or protected from impact damage.

3.2.2.6.5 Doors, hatches and other openings to the outside of the building, or where physical separation is required, shall be constructed to render the opening pest proof (deemed to be less than 3 mm between the edge of the door and the outer surface). These doors should possess either plastic curtains or air curtains or a self-closing curtain or a self-closing device, in order to minimize the entry of flying insects, when they are opened.

3.2.2.6.6 The doors and hatches inside the factory shall:

a. be well constructed, using suitable, durable materials which are easy to clean;
b. have smooth, impermeable and non-absorbent surfaces;
c. be close fitted; and
d. be impact resistance or protected from impact damage.

3.2.2.6.7 Where doors are painted or surface coated:

a. any paint materials applied to the doors shall be non-toxic, durable and of light colour; and
b. the surface shall withstand hosing with hot water and detergent, and withstand a reasonable impact.

3.2.2.6.8 If air locks are installed, they shall be designed to minimize movement of air into or between areas where food is exposed, processed or packed.

3.2.2.6.9 Window frames shall be made of a smooth impermeable material and window sills shall be as small as possible and inclined in order to prevent the accumulation of dust, and their use for the storage of articles.

3.2.2.6.10 Where there is a likelihood of breakage of glass windows that could result in the contamination of food, the windows are constructed of alternative materials or adequately protected. Windows without pest-proofing that open are not permitted in areas where food is exposed, processed or packed.

Note: This requirement may be met by effectively employing one or more of these methods: - a self-closing curtain, strip curtain or an air curtain; a pest proof annex; a self-closing device.

3.2.2.6.11 If airlocks are installed, they shall be designed to minimise movement of air into or between areas where food is exposed, processed or packed.

Note: A low-pressure airlock vented to the exterior with doors that cannot be opened simultaneously will meet this requirement.

3.2.2.6.12 If any services, chutes, conveyors or the like pass through external walls, the gap where they pass through, if any, must be sealed against the entry of pests and dust.

3.2.2.7 Stairs, Platforms and Stands

3.2.2.7.1Stairs, catwalks, platforms, stands, ladders and the like in processing areas shall be:

a. Of a construction and material that is impervious, non-slip, non-corroding, easy to clean and impact resistant;
b. Situated and constructed so as not to cause contamination of food processing areas, equipment and product by allowing potential contamination items to fall onto them.

3.2.2.8 Hoses

3.2.2.8.1 Hoses used in fish processing areas must be of a sanitary design. Hose nozzles should be cleaned and sanitised on a regular basis.

3.2.2.8.2 Hoses shall be fitted with a hose reel or a similar system to prevent hoses from touching the floor when not in use.

3.2.2.9 Footbaths

3.2.2.10 Personnel entranceways into the factory must be fitted with an appropriate footbath that contains an approved sanitizer used at the strength and conditions of use as advised by the manufacturer.

3.2.2.11 The footbath must be fitted with drainage facilities or suitable mechanism to dispose of the sanitizer solution. The footbath shall not pose a risk of contamination and must be in use at all times when the premises is operational.

3.3.3 Equipment

3.3.3.1 Equipment, Utensils, and Services: Design, Construction, and Installation

3.3.3.1.1 All equipment and utensils shall be designed, constructed, installed, operated and maintained so as to prevent contamination and adulteration of products and permit easy and thorough cleaning and sanitising and where necessary be accessible for inspection.

3.3.3.1.2 All equipment and utensils (except non-returnable items) including tubs and bins that are food contact surfaces shall be:

a. Smooth, non-absorbent and resistant to corrosion;
b. Free from pits, crevices and loose scale;
c. Made of materials which do not transmit odour, taste and are non-toxic;
d. Unaffected by food products;
e. Designed to prevent contamination and adulteration of the products with toxic materials, lubricants, fuel, metal fragments, contaminated water or other contaminants;
f. Avoid the accumulation of dirt which could contaminate the product and be the source of hygiene hazards;
g. Permit easy and thorough cleaning and disinfection;
h. Allow accessibility for inspection where necessary;
i. Capable of withstanding repeated cleaning and disinfecting.

3.3.3.1.3 Supporting framework for machinery, benches, sinks, worktables, foot-stands, etc. shall be constructed of smooth, impervious materials free from openings, ledges or crevices in which pests or potential contaminants may accumulate.

Note: Racks and shelving may accommodate this requirement with a minimum floor clearance of 300mm.

3.3.3.1.4 Welds created in the manufacture or repair of equipment shall be smooth and of sanitary design to prevent build-up of contamination and facilitate cleaning.

3.3.3.1.5 Equipment or fittings adjacent to wall or other equipment shall have any gaps sealed to prevent entry of moisture and dirt or have sufficient space to permit cleaning.

3.3.3.1.6 Equipment standing directly on the floor shall be installed:

a. By sealing directly to the floor to prevent the entry of moisture;
b. On a raised plinth coved at the junction of the floor and plinth; OR
c. On legs with a minimum of 300 mm clearance between the underside of the equipment and the floor.

3.3.3.1.7 Chutes and other enclosed transport systems shall be:

a. Constructed with inspection and cleaning hatches;
b. Easily dismantled for cleaning.

Note: Sorting trays, chutes, conveyors and bins may be made of high-density nylon, aluminium, stainless steel or fibreglass, free of crevices and with all internal junctions rounded out.

3.3.3.1.8 All overhead structures, services and fittings including lighting shall be easy to clean and:

a. Installed so as to avoid contamination either directly or indirectly of food by condensation;
b. Installed so as not to hamper cleaning operations;
c. Insulated where appropriate and be designed and finished as to prevent the accumulation of dirt, minimise condensation, mould development and flaking.

Note: May be met by locating all pipes and machinery above the ceiling. Ducts, conduits and pipes may be recessed into the wall or mounted at least 25mm clear. Long runs of exposed pipes should be avoided.

3.3.3.1.9 Racks for gloves and aprons shall be provided within or adjacent to the processing area.

3.3.3.1.10 Storage areas shall be provided for knives and other utensils when not in use.

3.3.3.1.11 Hose points shall be provided together with hose racks made of rust resistant material.

3.3.3.2 Product Handling and Conveying Equipment

3.3.3.2.1 Fish boxes, sufficient in number, shall be provided for the needs of the process. They must only be used within the plant, not for external transport of fish.

3.3.3.2.2 Fish boxes, which are used to transport product to the plant, and for the movement of fish within the plant, shall be constructed of a high-density plastic and be of a light colour. They shall have a smooth finish and their design shall avoid areas that could retain particles of product, grease and dirt. The boxes should be designed to permit drainage of any liquid**.**

3.3.3.2.3 Trolleys or similar equipment used to carry large fish or to feed blast freezers or chillers, they shall be made of non-corrodible material and have a smooth finish.

3.3.3.2.4 Ice shovels should be made of a light-coloured plastic, or of stainless steel. Wood is not permitted in any part of the construction.

3.3.3.3. Compressed Air

3.3.3.3.1 Where compressed air is used, the compressed air or other gases that come into direct contact with product or equipment surfaces or mechanically introduced into food or used to clean food-contact surfaces or equipment shall have a filtered air intake located in a clean place, contain no oil or substances hazardous to health or shall be treated or otherwise controlled in such a way that food is not contaminated with unlawful indirect food additives.

3.3.3.4 Use of Timber

3.3.3.4.1 Exposed or non-covered Timber shall not be permitted for use in the following areas of an establishment:

a. Product contact surfaces;
b. Processing areas;
c. Ice rooms, freezers, cold stores and chillers.
d. Anywhere fish and fishery products are exposed

3.3.3.4.2 This also applies in particular to knife-handles, spades for ice handling and filleting or cutting boards.

3.3.3.4.3 However timber is permitted in the following circumstances:

a) Doors, door jambs, windows in processing areas must be sealed by a durable non-toxic surface coating (e.g. gloss enamel, epoxy or polyurethane paint).
b) Clean sound and dry wooden pallets are permitted for the carriage of enclosed raw material or processed food in dry areas of processing only.

c) Racks and storage systems in cold stores used to store packed products can be made of clean and sound timber provide they are sealed by a durable non-toxic coating is preferable.

3.3.3.5 Containers

3.3.3.5.1 Containers used to store fish must be maintained in good repair and condition and not present a source of contamination.

3.3.3.5.2 Containers used to store unpackaged fish must be designed so that the melt water does not pose a risk of contamination.

3.3.4 Equipment for Inedible Products

3.3.4.1 All equipment used for the disposal, storage and treatment of wastes or inedible material shall be:

a. Clearly identified as such;
b. Leak proof and impervious;
c. Easy to clean or disposable;
d. Able to be closed securely if stored externally
e. Stored separately and not used for edible material.

3.3.5 Cleaning and Sanitising Facilities

3.3.5.1 Adequate facilities for cleaning and sanitising utensils and equipment shall be provided, where required, in the factory.

3.3.5.2 These facilities shall be constructed of corrosion resistant, non-absorbent materials capable of being cleaned effectively and be:

a. fitted with hot and cold-water points, with hoses where necessary;
b. fitted with sinks with hot and cold water for the washing of the movable equipment and fish boxes; and
c. where applicable, provided with high-pressure cleaning and disinfecting systems.

3.3.6 Hand washing Facilities

3.3.6.1 All main personnel entrances to any processing area shall be equipped with hand washing facilities that meet the following criteria:

a. Sufficient in number and provided in accessible locations throughout the processing areas for all staff to wash their hands both on entering the processing area and during processing;
b. Located adjacent to personnel access areas;
c. Provide suitably pressured potable hot or cold-water supply over a sink;
d. Provided with taps that are non-hand operated;
e. Provided with liquid soap contained with a dispenser;
f. Provided with single use paper towels held in a dispenser with a sufficient number of receptacles for disposing of used towels or with other hygienic means of hand drying;

g. Fitted with properly trapped waste pipes leading to drains.

h. Only used for the purpose of hand washing

3.3.6.2 Additional hand washing facilities provided in addition to those at the main processing area should also meet the above criteria unless it can be proven that minimal facilities do not pose a risk of contamination to the product.

3.3.6.3 Signs advising persons to wash their hands on entering or re-entering food handling areas shall be provided in a prominent position near food handling area entrances.

3.3.7 Storage and Support Areas

3.3.7.1 Refrigerated Storage

3.3.7.1.1Every refrigeration facility shall:

a. Have floors, walls, ceilings, doors and hatches that are constructed, installed and maintained according to the requirements for food handling areas as detailed in section 3.3.2;

b. Lighting that meets the requirements for food handling areas as detailed in section 3.4.3

c. Have other internal structures constructed of smooth, impervious and corrosion resistant material;

d. Those parties that are exposed to impact damage adequately protected.

e. Facilities designed to allow for adequate drainage of water away from the refrigeration until.

f. Be capable of reducing or maintaining the temperature of any food as required;

g. Be checked against a standardised thermometer and must record within +/- 1°C;

h. Have its temperature taken and recorded at least once every 24 hours while it is in operation;

i. Be designed to allow for adequate drainage of defrosted water away from the refrigeration unit.

j. Have adequate capacity to store all the raw material arriving at the establishment and which is not processed immediately and to ensure adequate protection from contamination.

3.3.7.1.2 Where refrigeration equipment is installed in a processing or packing area sufficient space shall be allowed for cleaning around and between the equipment

3.3.7.1.3 Plastic strip curtains or similar shall be installed to assist in air retention when cold store doors are open.

3.3.7.1.4 Facilities processing product that is eligible for export to the EU must equip their cold stores with an automatic temperature recording device where it can be easily read. The temperature probe must be positioned at furthest away from the cold source. The records must be readily available for the CA officers.

3.3.7.1.5 Where under-floor ventilation pipes are provided, they shall be proofed against pests. The design and construction of ice rooms and storage facilities shall be such that ice can be stored and removed in an efficient, hygienic manner and the ice protected from contamination at all times.

3.3.7.1.6 Container system units that are used, as cold stores shall:

a. Be soundly constructed to meet the requirement of refrigeration chambers as given above with no internal or external damage to cladding;
b. Have door seals that are sound;
c. Be installed on a paved area suitably kerbed, graded and drained with all access to the area sealed;
d. Have access provided on all sides to permit cleaning and avoid the harbourage of pests.

3.3.7.2 Ice Making Facilities

3.3.7.2.1 Ice plants and ice storage rooms should at least meet the following requirements:

a. Able to produce ice in quantities adequate to satisfy the needs of the processing including:
   - transport of raw material from the wharf
   - storage of raw material before processing
   - chilling of fish during processing

c. Meet the requirements of Storage and Support areas as given previously in this section.

3.3.7.3 Other Storage Areas

3.3.7.3.1 Non-refrigerated food stores shall:

a. Have floors, walls, ceilings, doors and hatches that are constructed, installed and maintained according to the requirements for food handling areas;
b. Have other internal structures constructed of smooth, impervious and corrosion resistant material;

3.3.7.3.2 Designed and maintained so as to prevent undesirable physical, microbial and chemical changes to processed food and its packaging, which could affect the suitability of the processed food.

3.3.7.4 Cartons, Wrapping Materials and Food Containers Stores shall:

a. Be dust and pest proof.
b. Be designed and maintained to prevent undesirable physical, microbiological, biochemical contamination.
c. Be stored on shelving or racks constructed to minimise damage and the risk of contamination.
d. Have lined walls if exposed packaging it so be stored within the storage area.

3.3.7.5 Stores for chemicals and maintenance compounds shall be secure (lockable and locked when not in use) and separate from product areas, support areas or other stores.

3.4 Services

3.4.1 Amenities

3.4.1.1 Changing Facilities, Living Areas, Toilets and Hand Washing Facilities

3.4.1.1.1 Suitable, adequate in number and conveniently located changing facilities, toilets and hand washing facilities shall be provided.

3.4.1.1.2 These facilities shall not be used for the storage of any processing ingredients or food.

3.4.1.1.3 The construction of the floors, walls, ceilings, doors and windows of the social amenities shall be of the same standard specified for the processing areas.

3.4.1.1.4 Living areas shall be completely separated from food handling areas and not open directly onto these areas.

3.4.1.1.5 Toilet and toilet areas should be adjacent to but separate from change rooms and shall be:

a. Completely separated from food handling areas and not open directly onto these areas;
b. Designed to ensure hygienic removal of waste matter:
c. Well lit, ventilated and maintained in a clean and tidy condition.
d. Toilet, change rooms and social amenities must be in good repair and condition.

3.4.1.1.6 Adequate number of flush lavatories, urinals and hand wash basins sufficient to the number of males and females, must be made available and connected to an effective drainage system. Lavatories are not to open directly into rooms where food is handled.

3.4.1.1.7 All toilets and urinals must be of the flushing variety. They should be constructed of materials that are easy to clean.

3.4.1.1.8 Hand wash facilities shall be provided near toilets and shall follow the requirements of Section 3.3.6.

3.4.1.1.9 Notices shall be prominently posted in toilet areas directing persons to wash their hands after use.

3.4.1.1.10 An area for undressing out of day clothes and shoes shall be provided. This room should contain a locker (or a hanger) for each person to store (or hang) the city clothes and racks for the shoes.

3.4.1.1.11 The surfaces of the lockers or hangers and racks shall be smooth, non-absorbent and resistant to corrosion. The use of timber is prohibited for the construction of lockers, hangers and racks unless that timber is painted with a suitable non-toxic paint and the area remains dry.

3.4.1.1.12 Amenities must be in good repair and condition and regularly maintained.

3.4.2 Effluent and Waste Disposal

3.4.2.1 Facilities shall have an efficient effluent and waste disposal system maintained in good order and repair to prevent the contamination of fishery products with bacteria from residues and wastes by:

a. treating by-products in an appropriate way in the event that by-products are destined for human consumption
b. separating and removing guts and other waste that may constitute a danger to public health from the vicinity of products intended for human consumption
c. draining liquid waste water and treat sewerage

3.4.2.1 Effluent lines (sewerage, storm water, processing) must be large enough to carry peak loads and constructed so as to avoid contamination of the potable water supply.

3.4.2.2 Sanitary drainage shall not be connected with any other drains within the licensed facility and be directed to a septic tank or sewerage system.

3.4.2.3 Septic tanks and waste trap systems shall be located so as to avoid a hygiene hazard to the product and located away from any processing area or entrance to the building.

3.4.2.4 The storm-water drainage system shall not to be connected to the effluent treatment system.

3.4.2.5 They are to be designed and constructed to avoid the risk of contamination.

3.4.2.6 Where drainage channels are fully or partially open, they must be designed so as to ensure that waste does not flow from a contaminated area towards a clean area, in particular an area where food is handled, thus likely to present a high risk to the final consumer.

3.4.3 Lighting

3.4.3.1 Lighting of sufficient intensity and quality shall be provided throughout the factory to allow for production and inspection activities.

3.4.3.2 Lighting shall not distort colourings and be shadow free at work and inspection surfaces.

3.4.3.2 Light fittings shall be:

a. Equipped with a protective cover or other means so that breakage will not contaminate the product;
b. Readily accessible for cleaning purposes.
c. Wherever possible, recessed into or flush fitted against the ceiling so that no exposed ledge is created. However, if this is not possible light fittings can protrude passed the ceiling provided there is no chance for dirt and dust accumulation.

3.4.3.3 Where light fittings cannot be installed in accordance with the requirements above, they may be suspended from the ceiling by cables provided that the top of the fitting is sloped at approximately 45 degrees.

3.4.4 Ventilation

3.4.4.1 Adequate ventilation shall be provided to prevent excessive build-up of heat, steam, condensation and other undesirable hazards.

3.4.4.2 Where cooking, canning or boiling operations are carried out extractor fans and canopies shall be installed and have capture velocities capable of conveying all heat, fumes and other aerosols through the exhaust canopy opening.

3.4.4.3 Airflow shall always be directed from clean areas to dirty areas.

3.4.4.4 Ventilation systems are to be so constructed as to enable filters and other parts requiring cleaning or replacement to be readily accessible.

3.4.4.5 Where fans, air conditioning systems and other air-blowing equipment are located and operated:

i) it shall be done in a manner that minimizes the potential for contaminating food, packing materials and food-contact surfaces; and,
ii) all extraction fans, blowing fans and air conditioners shall be protected with filters and meshes to prevent the entry of dust, insects and birds.

3.4.5 Water, Ice and Steam Supply

3.4.5.1 Facilities shall be required to provide a permanent supply of potable water or alternatively of clean seawater.

3.4.5.2 Potable water and clean seawater must meet the following parameters:

Microbiological Parameters and Acceptable Quality Limits.

Parameter	Volume of the sample in ml	Limit
Total Coliform bacteria	100	0 (number/100 ml)
Escherichia coli	100	0 (number/100 ml)
Clostridium perfringens (including spores)[1]	100	0 (number/100 ml)
Enterococci	100	0 (number/100ml)
Chlorinated water		Range of between 0.1-0.2ppm or greater

Reference: Reg (EC) Council Directive: 98/83 EC of 3 November 1998- on Quality of water intended for human consumption

[1]This parameter need not be measured unless the water originates from or is influenced by surface water.

3.4.5.3 An ample supply of potable water shall:

a. Be available under adequate pressure and suitable temperature;
b. Be provided with adequate facilities for its storage where necessary and distribution;
c. Be provided with adequate protection against contamination.
d. If used in food handling areas meet the parameters given above.

3.4.5.4 Operators of establishments shall ensure the water is adequately chlorinated, or otherwise treated, to ensure the on-going potability of any water used.

3.4.5.5 Chlorine shall be added in-line by dosing or injection (gas or liquid) prior to intermediary storage to permit sufficient contact time with the water in order to allow the chlorine to react with the organic matter. The retention tank shall have to retain water together with the chlorine added for 30 minutes;

3.4.5.6 If chlorine is used a free residual chlorine reading of 0.5 - 2 ppm[i] should be available at points of use within the establishment.

3.4.5.7 If the water used in the establishment receives additional treatment prior to use, this must be done in accordance with the instructions of the manufacturer of any equipment or chemicals utilized and under supervision of the management of the establishment.

3.4.5.8Non-potable water may be used for steam production, refrigeration, fire control and other similar purposes not connected with food and shall be carried in completely separate identifiable lines (preferably by colour) with no cross-connections or back-flow into potable water lines.

3.4.5.9 Non-potable water outlets in processing areas shall be clearly identified.

3.4.5.10 Potable water shall only be used for the following:

a. in contact with fish or fish-contact surfaces;
b. the manufacture of ice; and
c. cleaning and sanitising in the establishment.

3.4.5.11 All pipe-work in the water distribution system shall be impermeable, well-constructed and in good condition.

3.4.5.12 There shall be provision to prevent backflow or cross-contaminations between potable and non-potable water within the establishment.

3.4.5.13 Recycled water used in processing or as an ingredient is not to present a risk of contamination. It is to be of the same standard as potable water, unless the competent authority is satisfied that the quality of the water cannot affect the wholesomeness of the foodstuff in its finished form.

3.4.5.14 Clean seawater that does not contain any micro-organisms may be used in food handling areas provided it is also free from excessive turbidity, offensive odours, colour and other contaminating substances.

3.4.5.15 Ice which comes into contact with food or which may contaminate food is to be made from potable water or, when used to chill whole fishery products, clean water. It is to be made, handled and stored under conditions that protect it from contamination.

3.4.5.16 All storage tanks, cooling towers and pipes used in handling water shall be constructed to facilitate cleaning and inspection.

3.4.5.17 Steam used directly in contact with food is not to contain any substance that presents a hazard to health or is likely to contaminate the food.

3.4.5.18 Adequate storage tanks shall be provided, where necessary, with sufficient capacity to supply the requirements of the establishment when operating at maximum capacity and to allow sufficient contact time for chlorine where necessary.

3.4.5.19 The tanks must be made of smooth, impermeable, easily cleaned surfaces and be fitted with an inspection hatch. The tanks shall prevent the entry of pests, rain or ground water and any process water that may flow out of the establishment. The area surrounding the tank must be kept clean and free of rubbish, dirt or water.

3.4.5.21 The licensed facility shall document the complete procedure for the control and treatment of sea and potable water used, including treatment and analytical results.

3.4.5.22 The documented programme must cover:

a. The source(s) of the water supply(ies) used within the facility
b. What treatment, if any, is applied to the water on-site
c. Checks to be carried out to determine potability of the water supply including frequency of checks, parameters to be measured and limits to be met
d. Where town supply water is used, a copy of the water test results from the local water authority renewed every 6 months
e. A reticulation plans showing potable and non-potable supplies (where applicable) and taps used for water sampling tests
f. Testing parameters to be used
g. Corrective actions to be followed in the event of a non-compliance with the documented programme

3.4.5.23 The operator must implement a reticulation management plan for potable water used within a premise including:

a. Systems to ensure that reticulation of water throughout the premises is not adversely affected and that the intended water quality is delivered at point of use; and

b. Systems to ensure that there is no unintentional mixing of water of different standards
c. An action plan with appropriate sanitation procedures to be implemented in the event of non-compliance with the reticulation plan

3.4.6 Water Testing

3.4.6.1 Fish Operators shall test their water to prove the water they use at point of use is potable and meet the parameters given in the previous section. Such testing shall involve:

a. Gaining a copy of water test results from an approved laboratory at least 6 monthly and holding these on file.
b. Completing or obtaining point-of-use tests on a 6-monthly basis (or more frequently) for the presence of total coliforms and *Escherichia coli.* If any 100 ml sample tests positive for any of these tests then a re-test shall be performed immediately. If two consecutive samples show the presence of coliform bacteria or *E. coli* the source must not be used until the contamination is removed.
c. Water samples shall be increased depending of the scenario, doubt in the water quality and capacity for adequate chlorination and testing facilities shall probe more regular testing.

3.4.5.2.2 Water samples shall be taken from outlets within the establishment on a rotational basis. The tap to be sampled shall be run for 2 – 3 minutes to flush out the pipe. The top of the bottle shall be flamed before the sample is collected. The sample shall be refrigerated to below 4 degrees Celsius after taking and sent to the laboratory with testing to commence within 24 hours of the sample being taken.

3.4.7 Laundry

3.4.7.1 A licensed facility may contract out its laundry services for protective clothing and other laundry. If contracted out the transportation of laundered clothing must perform this in a hygienic manner.

3.4.7.2 If performed internally the laundry must have sufficient capacity for the number of employees and carry the task in a hygienic manner from washing through to final delivery back to the storage area awaiting use. Internal laundries must have access to both hot and cold water. Drying must be performed mechanically or in enclosed hygienic environments.

3.5 Landing Sites/Loading/Unloading Docks

3.5.1 The landing site shall be:

a. Used specifically for that purpose i.e. landing of fish and not shared with activities such as bunkering of vessels or other activities that could cause contamination of the fish;
b. Kept clean and tidy at all times especially when landing of fish is taking place.
c. Be accessible to potable water for washing down and amenities for personal hygiene use.

3.5.2 Unloading and landing equipment must be constructed of corrosive resistant material that is easy to clean, disinfect and kept in a good state of repair and cleanliness. Unloading and loading equipment must ensure that damage to fish is prohibited.

3.5.3 Where the load has to be assembled prior to loading the marshalling area shall be protected from the elements either through use of a cover or shade or through speedy marshalling that minimises any risk of contamination.

3.5.4 Both the loading dock and associated marshalling areas shall have sufficient lighting.

3.5.5 The area nominated for truck movement shall be finished with a well-drained surface that is impervious and durable.

3.5.6 Road access ways and storage areas for container system units shall be maintained to minimise the risk of contamination to product.

3.5.7 On-site or easily accessible wash facilities shall be made available for container system units.

3.5.8 The loading dock must be kept free from bunkering and other activities that may contaminate the fish being unloaded unless the bunkering operation is controlled and there is no risk of contamination.

3.6 Fishing Vessels

3.6.1 The following vessels are subject to inspection by the CA officer using the CA form F07:

- Offshore Fishing vessels that are RMI flagged
- RMI flagged vessels operating in RMI and in the region undertaking fishing activity.

3.6.2 Crew must be trained in post-harvest management and good hygienic practices and records held on file.

3.6.3 Fishing vessels intending on exporting product directly or indirectly to the European Union will be subject to these Industry Standards and subsequent inspections by the CA.
Refer to Appendix Five for the EU standards pertaining to vessels.

3.7 Transporters of Fish Products and Ice

3.7.1 Transporters carrying ice or fish products destined for the EU must be approved by the CA. Also, personnel operating transport must be trained in good hygienic practices and records held on file.

SECTION 4: Operational Requirements

4.1. Hygiene and Sanitation

4.1.1 General Maintenance

4.1.1.1 Buildings, vessels, equipment, utensils, refrigeration and all other physical aspects of a licensed facility including drains shall be kept in good repair, in a clean and orderly condition and operated in accordance with these standards.

4.1.1.2 All licensed facilities shall have a documented programme for repairs and maintenance, including a record of all repairs and maintenance activities that are scheduled for completion, with appropriate target dates for completion.

4.1.1.3 Repairs shall be carried out as soon as possible without interference to handling and processing and may cause the facilities closure during certain repairs.

4.1.1.4 All chemical compounds used as cleaners, sanitisers, soaps, detergents, lubricants or pesticides shall be suitable for use in food processing premises and the following information provided:

a. Trade name and type of chemical compound (active ingredient);
b. Purpose (e.g. detergent, sanitiser, hand wash, etc.) and, if available;
c. Classification
d. Material Safety Data Sheet Available and instruction for usage.

4.1.1.5 The operator shall maintain a register of chemicals that are used in the facility, their purpose and food grade status.

4.1.2 Cleaning and Sanitising

4.1.2.1 A documented cleaning and sanitation programme shall be in place at each licensed facility and all cleaning personnel shall be suitably trained in cleaning and sanitising techniques. All cleaning and sanitation procedures shall be monitored and records maintained.

4.1.2.2. The programme shall cover the cleaning and sanitising of the fish premises, including product areas, appliances, support areas and stores. The programme shall be documented and contain the following elements:

a. Areas/appliances to be cleaned;
b. Detergents/sanitisers that are to be used;
c. Frequency of cleaning;
d. Procedures and work instructions for the various cleaning and sanitising operations;
e. Monitoring/checks of the cleaning
f. Recording of cleaning procedures;
g. Personnel responsible;

4.1.2.3 To prevent the contamination of food, equipment, utensils and surfaces that contact food shall be:

a. Cleaned as frequently as necessary either immediately after the end of each working day or at such times as may be appropriate to maintain hygienic conditions;
b. Sanitised when there is a risk of contamination but not less than daily.

4.1.2.4 Surfaces contacting food must be adequately rinsed after the use of any detergents prior to handling of the food unless the detergent or sanitizer is deemed by the manufacturer to be a “non-rinse” variety.

4.1.2.5 Adequate precautions shall be taken to prevent food from being contaminated during cleaning or sanitising of rooms, equipment or utensils.

4.1.2.6 Staff changing facilities, toilets and lunchrooms shall be kept clean at all times. Roadways, yards and other areas in the immediate vicinity of the licensed facility shall be kept clean.

4.1.3 Inedible By-products

4.1.3.1 Inedible by-products and other inedible material shall:

a. Be stored so as to avoid contaminating food for human consumption;
b. Be removed from the food preparation area as often as necessary to avoid contamination.

4.1.3.2 All equipment used for the disposal, storage and treatment of wastes or inedible material shall be clearly identified, stored separately and not used for edible material.

4.1.3.3 Waste containers used for the disposal, storage and treatment of wastes or inedible material shall comply with the following requirements as to hygiene, and unless special facilities are provided for the continuous disposal of waste, waste must be placed in leak proof, impermeable containers:

a. that are provided with tight fitting lids to prevent the entry of insects, rodents and other animals if outside;
b. that are designed to facilities cleaning and disinfection;
c. that are clearly marked for that purpose only or be of a different colour to boxes used for fish for human consumption;
d. that, when used for temporary storage of viscera and offal in the work room, should be kept below the level of the work tables to avoid splashing and contamination of the fishery products;
e. that must be always thoroughly cleaned and disinfected after use.

4.1.3.4 Sanitising of edible materials and equipment used for the disposal, storage and treatment of wastes shall not take place together but in a physically separate environment.

4.1.3.5 Waste shall be removed from the vicinity of the establishment at regular intervals in order to ensure that the waste does not constitute a source of contamination of the establishment or of pollution of its surroundings by the development of smells and the presence of insects and rodents.

4.1.4 Disposal of Waste

4.1.4.1 Waste shall be removed from food handling areas and other working areas as often as necessary to avoid potential contamination sources.

4.1.4.2 Immediately after the disposal of waste, receptacles used for the storage and any equipment, which has come into contact with the waste, shall be cleaned and sanitised.

4.1.4.3 Waste stored in a fish premises must not constitute a source of contamination for the establishment or of pollution of its surroundings. The waste storage area shall be kept clean.

4.1.4.4 All outside waste disposal bins shall be fitted with close-fitting lids that are kept closed and which are easy to clean and sanitise.

4.1.5 Domestic Animals

4.1.5.1 Domestic animals are not permitted on the premises unless they are guard dogs in which case their area of activity will be limited to outside use only.

4.1.6 Vermin Control

4.1.6.1 The establishment:

i) shall afford appropriate facilities against pests such as insects, rodents, birds, or other animals;

ii) shall take effective measures to exclude pests and animals from the processing areas and to protect products against contamination by pests and animals, with exception of live animals such as crustaceans and fish to be placed on the market alive or not admitted.

4.1.6.2 There shall be an effective and continuous schedule for the detection, control and eradication of pests.

4.1.6.3 Pest control measures undertaken shall not constitute a hazard to human health and product safety.

4.1.6.4 Control measures involving treatment with chemicals, shall only be undertaken by personnel who have a complete understanding of the health hazards these chemicals may pose to the product. Chemicals used for pest control shall be approved by the CA.

4.1.6.5 Any units used to kill flying insects shall be positioned away from the main processing lines or protected in such a way as to not present a risk.

4.1.6.6 Companies shall document a vermin control programme and this programme shall cover:

a) vermin considered on site

b) actions to prevent vermin breeding or entering the facility

c) actions taken to eliminate vermin
d) vermin control chemicals to be CA approved
e) details of bait stations and their location
f) checks carried out to demonstrate effectiveness

4.1.6.7 Accurate and legible records of the location and frequency of servicing bait stations at a licensed facility shall be kept.

4.1.7 Hazardous Substances

4.1.7.1 Cleaning and sanitation, maintenance and vermin control chemicals must be of a type approved for use in food processing areas. Companies shall hold on file written confirmation of this from the supplier.

4.1.7.2 Pesticides, cleaning agents or other substances, which could represent a hazard to health, shall be suitably labelled with the product name and a warning about their toxicity and use and extreme care carefully adhered to avoid the chemicals contaminating food, food contact surfaces and ingredients.

4.1.7.3 Hazardous substances shall be stored in rooms or cabinets used only for that purpose, separate from the main processing area and handled only by authorised and properly trained persons.

4.1.7.4 Except when necessary for hygienic or preparation purposes no substances which could contaminate food may be used or stored in food handling areas or be stored with any product, ingredients or product packaging materials.

4.1.7.5 Companies shall document a Chemical or Hazardous Goods programme and this programme is to cover:

a. A list of chemicals used on site (cleaning and sanitation, maintenance and vermin control chemicals used within the processing area vicinity)
b. That chemicals will only be stored in secure, separate designated areas
c. Only trained persons shall handle chemicals.
d. Requiring all chemicals to be labelled.
e. Record of Material Data Sheet for chemical used

4.1.8 Door management policy

4.1.8.1 Companies shall document a door management procedure that details the controls on door closure in the following areas:

a. Processing areas
b. Chillers
c. Freezers

4.2 Personnel Hygiene

4.2.1 Documented Programme

4.2.1.1 The establishment must document a programme detailing how personal hygiene and hygienic work practice will be controlled and, in particular:

a. What protective clothing is to be worn.
b. Controls on personal conduct e.g. smoking, spitting etc.
c. A hand washing procedure.
d. Controls on jewellery
e. Controls on communicable diseases, illness, sores and wounds.
f. Controls on visitors and contractors.

4.2.2 Personal Effects and Clothing

4.2.2.1 Personal effects and clothing shall not be worn in food handling areas.

4.2.3 Hygiene Training

4.2.3.1 The manager of a licensed facility shall arrange for adequate and continuous training of all food handlers in personal hygiene and hygienic handling of food to ensure that the precautions necessary to prevent contamination of food are understood. Training shall include reference to relevant parts of these standards.

4.2.3.2 Training records for each person trained shall be maintained.

4.2.4 Communicable Diseases

4.2.4.1 No person who:

a. Is suffering from or a carrier of a communicable disease;
b. Is suffering from a condition causing a discharge of pus or serum (e.g. weeping sore, infected cuts, boils) from any part of the head, neck, hands or arms;
c. Has reason to suspect there is a chance of transmitting a disease producing organism to the product
d. Is suffering from vomiting or diarrhoea

shall prepare, pack, or handle any material likely to be used in constructing the product.

4.2.4.2 If the manager of a fish processing establishment has reason to suspect that any person is likely to transmit a disease producing organism to the product, the manager shall ensure, the person does not enter the licensed facility until he/she produces a certificate from a medical practitioner indicating that they are free from infection and are non-infectious.

4.2.5 Injuries

4.2.5.1 Any person with an uninfected wound or cut shall discontinue working with food or being in contact with any food contact surfaces until the wound is covered with a clean waterproof dressing that is securely attached.

4.2.6 Personal Cleanliness and Conduct

4.2.6.1 All staff while on duty in food handling areas should maintain a high degree of personal cleanliness.

4.2.6.2 Fingernail polish is not permitted by those persons handling fish with bare hands.

4.2.6.3 Jewellery including watches, earrings, and rings (other than wedding bands which must be covered by a glove) shall not be worn in a fish processing area.

4.2.6.4 Any behaviour, which could result in the contamination of food products such as chewing, eating, spitting, smoking, and other unhygienic behaviour shall be prohibited in food handling areas.

4.2.6.5 All personnel shall wash their hands frequently and:

a. On entering product processing areas;
b. Immediately after using the toilet;
c. After handling dirty or contaminated materials such as rubbish;
d. After chewing, eating, smoking or drinking;
e. After cleaning procedures, handling sanitizers and similar cleaning chemicals.
f. Whenever contaminated.

4.2.6.6 Persons handling food, ingredients and items used in food handling shall wash and sanitise their hands immediately after handling any material that might be capable of transmitting contaminants.

4.2.6.7 Where necessary to minimise microbiological contamination, employees must use disinfectant hand dips.

4.2.6.8 The wearing of clean gloves does not exempt the wearer from having thoroughly washed their hands.

4.2.7 Protective Clothing

4.2.7.1 All personnel and visitors entering the processing area shall at all times:

a. Wear suitable protective clothing and impermeable footwear;
b. Wear a head-covering that encloses all hair;
c. A waterproof, impermeable apron;
d. If the person is wearing gloves, shall ensure that the gloves are non-absorbent and in around, clean and sanitary condition;
e. If the person has a beard, wear a suitable beard mask

4.2.7.2 If a person wears disposable gloves or other disposable protective in the food handling area the disposable clothing shall be discarded after use and not be reused.

4.2.7.3 Protective clothing worn by persons in food handling areas shall:

a. Be clean and lightly coloured;

b. Be either washable or disposable;

c. Not have an outer breast pocket or sewed on buttons.

4.2.7.4 Protective clothing including hats, hairnets, boots, coats, aprons and gloves shall be maintained in a clean condition and in good repair.

4.2.7.5 Protective outer clothing including footwear, aprons, headgear and gloves used in the processing area shall only be worn within the area approved and within the site boundaries or thoroughly cleaned and sanitised before use.

4.2.8 Visitors

4.2.8.1 Precautions shall be taken to prevent visitors to food handling areas from contaminating food.

4.2.8.2 This shall include the use of protective clothing and adhere to health attestation set by the operator. Visitors shall comply with provisions of this Standard.

4.2.9 Supervision

4.2.9.1 The occupier of a licensed facility shall allocate responsibility for ensuring personnel comply with the requirements of this standard (4.2) to competent supervisory personnel.

4.3 Processing

4.3.1 Raw Materials

4.3.1.1 A food business operator must have a documented programme that covers the inspection, handling and storage procedures for all raw materials and ingredients.

4.3.1.2 A food business operator is not to accept raw materials or ingredients, other than live animals, or any other material used in processing products, if they are known to be, or might reasonably be expected to be, contaminated with parasites, pathogenic microorganisms or toxic, decomposed or foreign substances to such an extent that, even after the food business operator had hygienically applied normal sorting and/or preparatory or processing procedures, the final product would be unfit for human consumption.

4.3.1.3 Fish and fishery products shall be subject to a temperature and organoleptic (smell and appearance) check on arrival. Records shall be kept and made available to the CA inspector on request.

4.3.1.4 Fish shall be free of:

a. heavy injuries and scratches;

b. bad discoloration; and

c. blemishes and dirt.

4.3.1.5 Chilled products shall not exceed melting ice temperature (-1 to 4) degrees Celsius; brine frozen product shall not be warmer than - 9 degrees Celsius and frozen product shall not be warmer than -18 degrees Celsius. If these temperatures are exceeded the raw material shall be placed on hold, time of

exposure assessed and an organoleptic check carried out. Depending on the time and temperature of product, including handling, the product sample can be subjected to testing.

4.3.1.6 Fishery products which are not processed immediately upon arrival at the establishment shall be washed with clean portable water and stored in suitable reception tanks or put in fish-bins, iced and stored in a chill room.

4.3.1.7 It is recommended that no products are stored for more than one day before processing is eviscerated. The priority shall be to eviscerate the fish as soon as possible after arrival at the establishment (if not done previously) in order to maintain the intrinsic quality of the product.

4.3.1.8 Raw materials, ingredients and packaging stored in a licensed facility shall be:

a. Maintained under conditions that will prevent spoilage;
b. Protected against contamination;
c. Protected against damage.
d. Not processed or used unless inspected for contamination, decomposition and parasites in the gut cavity as applicable before processing and found to be in a sound condition. The nature and frequency of such inspections shall be set by the operator and can be verified by the CA officer during his or her inspections checks.

4.3.1.9 Stocks of raw materials and ingredients shall be used so as to ensure that the oldest stock is used first.

4.3.1.10 Suitable provision shall be made for the washing of raw materials as necessary.

4.3.1.11 The marking of the product in carton and ship to shore inner and outer cartons, must be permanent and durable and not transmit any undesirable substance to the products. Thus, product be protected from such transmission via a barrier.

4.3.1.12 Lacquer applied to the inner surface or part of the inner surface of packaging shall:

a. cover the inner surface in continuous film
b. be uniform in thickness
c. leave no area of the surface uncoated
d. firmly adhere to the covering
e. be compatible and non-toxic with the food being packed.

4.3.2 Prevention of Cross Contamination

4.3.2.1 Effective measures shall be taken to prevent cross contamination of food.

4.3.2.2 Effective measures shall be taken to prevent raw material or semi-processed material coming into contact with and contaminating the end product.

4.3.2.3 Fish Business Operators will be required to identify risks within their processing facility, and for each risk demonstrate adequate control.

4.3.2.4 The following areas should be considered as part of the risk assessment: related to cross contamination;

a. Personnel
b. Equipment
c. Water splash
d. Use of hoses
e. Condensation
f. Construction of plant and equipment etc.
g. Packaging and incoming materials
h. Waste material
i. Chemicals and maintenance compounds
j. Vermin

4.3.3 Processing Requirements

4.3.3.1 All steps in the production process including packing shall be performed without unnecessary delay and under conditions that will minimise the possibility of contamination, deterioration and growth of microorganisms.

NOTE: If frozen food is thawed or tempered for the purpose of use in production, it shall be done under hygienic conditions that avoid contamination.
Melted water produced shall be adequately drained and temperature rises kept to a minimum. It shall be brought to its thawed state as quickly as possible without causing undesirable physical, biochemical and microbial changes to the food.

4.3.3.2 The company shall document process controls used to maintain the safety and quality of the product in particular times and temperatures.

4.3.3.3 Operating practices shall be designed to avoid contamination of product, product surfaces and packaging materials.

4.3.3.4 Where chilled, unpackaged fishery products (raw material) are not dispatched, prepared or processed immediately after reaching the establishment, they must be stored or kept under ice in a chill store. Re-icing must be carried out as often as necessary.

4.3.3.5 Ice used, with or without salt, must be made from potable water or clean seawater and be stored under hygienic conditions in containers provided for the purpose, such containers must be kept cleans and in a good state of repair.

4.3.3.6 Pre-packed chilled products must be chilled with ice or kept in a chill store.

4.3.3.7 Operations such as heading and gutting shall be carried out quickly and hygienically. Products must be washed thoroughly with potable water or clean seawater immediately after such operations.

4.3.3.8 The quantities of fish on work tables at any one time should be kept to a minimum. If there are delays in processing fish on tables should be adequately iced.

4.3.3.9 During work breaks, products shall not be left on the worktables. Processing of fish already on the tables shall be completed before line workers leave their posts.

4.3.3.10 Operations such as filleting and slicing shall be carried out quickly and in such a way as to avoid contamination or spoilage, and in a place other than that used for heading and gutting operations. Fillets and slices must not remain on worktables any longer than is necessary for their preparation. Fillets and slices to be sold fresh must be chilled as quickly as possible after preparation.

4.3.3.11 If fillets are not immediately packed or frozen, they shall be stored at 0°C with adequate quantities of ice, or in a chill store.

4.3.4 Separation of EU eligible and EU-ineligible product

4.3.3.1 To be eligible for export to the EU, seafood products must have been produced or handled in an EU approved establishment (either from the internal CA list or the official EU approved list) at all stages of processing, handling and storage.

4.3.3.2 Operators must ensure the physical separation of EU-eligible from seafood products ineligible for the EU.

> *NOTE: Physical separation means allocation of a separate store or separate areas within a store for EU and non-EU eligible product.*

4.3.3.3 Operators must have procedures and methods to distinguish ineligible seafood products from EU-eligible seafood products.

4.3.3.4 Where any alleged EU-eligible seafood products are indistinguishable from ineligible seafood products then the former are deemed to be ineligible and must be dealt with accordingly.

4.3.3.5 Packaged products may be separated per pallet.

4.3.3.6 Vertical stacks of pallets should not mix EU and non-EU market eligibility.

4.3.3.7 The CA shall perform checks on the adequate separation of EU and non-EU eligible product.

4.3.5 Processing and Production Records

4.3.5.1 The operator shall keep, for audit by a CA officer, records of each lot of fish processed.

4.3.5.2 Records shall show evidence that fish has been processed in accordance with these standards.

4.3.5.3 Records shall be signed and dated by the operator or the person delegated this responsibility by the operator. Records should also show the time the measurement was taken.

4.3.5.4 The operator shall hold records on file for at least TWO years from date of production.

4.3.5.5 All records used as evidence to demonstrate compliance with these Standards must be:

- Complete
- Accurate
- Of sufficient quality
- Appropriately stored and accessible within 24 hours of request by an authorised person
- Supplied as required to FVO or the Director

4.3.5.6 Records shall enable the operator, the Director or an authorised person to readily ascertain the nature, quantity and source of any fish or fish product handled in the fish premises.

4.3.6 Storage

4.3.6.1 Food including raw materials, ingredients and finished product shall be stored under conditions that will:

a. Minimise contamination and growth of micro-organisms;

b. Protect the food against deterioration and damage.

4.3.6.2 No materials other than those used for immediate processing shall be stored in an area in use or processing.

4.3.6.3 Vehicles not designed for use in the licensed facility shall be garaged in an area not used for processing.

4.3.6.4 Storage areas must be adequately pest proofed.

4.3.6.5 Dry ingredients shall be stored in a closed, well ventilated, pest proof and clean area with the required room temperature and humidity. The products shall be protected against spoilage, damage and contamination.

4.3.6.5 Packaging materials shall be stored in a closed, well ventilated, pest proof, dust-free and clean area with the required room temperature and humidity.

4.3.7 Calibration of Measuring Equipment

4.3.7.1 All measuring equipment, gauges and devices used in connection with food shall be:

a. graduated so as to be easily read

b. be checked to ensure their accuracy is sufficient for the task in hand.

c. be adequate in number for their designated uses and adequately maintained

4.3.7.2 Where measurements are critical to the maintenance of food safety and management of hazards, the equipment shall be calibrated so as to be accurate.

4.3.7.3 Frequency of calibration shall be determined by the type of equipment and its ability to measure accurately over time.

4.3.7.4 Hand held thermometers used to measure product temperatures should be calibrated monthly using ice water to compare 0°C and boiling water to compare 100°C.

4.3.7.5 Temperature measuring devices for chillers and freezers should be calibrated against a standard thermometer at least annually.

4.3.7.6 A calibration system shall be applied either in-house or by an external authority. The results of the calibration shall be recorded and records kept for 2 years.

4.3.8 Loading and Unloading

4.3.8.1 Unloading and landing equipment must be constructed of material which is easy to clean and disinfect and must be kept in a good state of repair and cleanliness.

4.3.8.2 During unloading and loading, contamination of fishery products must be avoided. It must in particular be ensured that:

a. unloading and landing operations proceed rapidly;
b. fishery products are placed without unnecessary delay in a protected environment at the temperature required on the basis of the nature of the product and, where necessary, in ice in transport, storage or market facilities, or in an establishment;
c. equipment and handling practices that cause unnecessary damage to the edible parts of the fishery products are not permitted.

4.3.8.3 After landing or, where appropriate, after first sale, fishery products must be transported without delay, under the conditions laid down in section 4.4.5 and 4.4.5 of this Standard, to their place of destination.

4.4 Freezing, Chilling, Storage and Transport

4.4.1 Chilling Fish and Fish Products

4.4.1.1 The chilling of fish shall be performed with sufficient rapidity to prevent undesirable physical, biochemical and microbiological deterioration.

4.4.1.2 The temperature of fish that has been chilled shall not go below temperature of melting ice (-1°C or above +4°C)

4.4.1.3 Cool room or brine tank facilities or the provision for sufficient ice may be provided in the licensed facility for the purpose of cooling product to within the temperature of melting ice (range of -1°C and +4°C). These facilities shall be adequate to cool and maintain the product within that range until the product is removed for further processing.

4.4.1.4 A chill store used to store chilled fish should be operated at a temperature of melting ice (-1°C and +4°C).

4.4.2 Freezing Fish and Fish Products

4.4.2.1 The term freezing is applied to the continuous process of reducing the thermal core temperature of fish or fish product from an ambient temperature to -18°C or colder.

4.4.2.2 The freezing process shall be carried out in a way that minimises undesirable, biochemical and microbiological changes.

4.4.2.3 Fish shall be frozen in a room or chamber specifically designed for this purpose and as rapidly as possible.

4.4.2.4 The freezing process shall be carried out in one chamber except that fish cooled to -10°C or colder may be transferred to a second freezer for continuation of the process provided the transfer causes only a minimal rise in temperature

4.4.3 Freezing Capability

4.4.3.1 Freezing equipment must have the capability to reduce the internal temperature of the fish or fish product to -18°C within 24 hours.

4.4.3.2 Freezing equipment, when utilized for the initial freezing of unfrozen fish or fishery products should reduce the product temperature through the zone of maximum water crystallization (usually between -1°C to -5°C) preferably within 4 hours, but not exceeding 6 hours, from the commencement of the refrigeration process.

4.4.3.3The process shall not be regarded as completed unless and until the product temperature has reached -18°C as core product temperature. An exception is brine frozen fish to be used for canning, which may be frozen at higher temperature, although not exceeding -9°C.

4.4.3.4 Where the refrigeration process is continued in order to reduce the thermal core temperature to -18°C or colder, the whole refrigeration process should preferably be completed within 8 hours, but not exceeding 12 hours.

4.4.3.5 Effective measures shall be taken to keep temperature rises to a minimum after the freezing process and during handling and transport.

4.4.3.6 The freezing of fish shall be carried out in a freezer capable of reducing the internal core temperature of fish to minus 18 degrees Celsius or colder within 24 hours and must not be carried out in a cold store without blast capacity.

4.4.3.7 Blast freezers shall not be loaded with fish in excess of the design capacity of the equipment. Reference should be made to specifications of the supplier of the refrigeration equipment in order to determine the recommended capacity, but generally loading should not exceed 70% of the internal volume.

4.4.3.8 After freezing, cold stores shall be operated to maintain fish in a frozen state with the product temperature maintained at -18°C or colder except at times when the freezer is on a defrost cycle.

4.4.3.9 A record of cold store temperatures shall be maintained by either:

a. A continuous monitoring system that shall be checked at least once a day, or,
b. Manual readings taken at least daily. In situations where the cold store temperature is found to be above minus 18 degrees Celsius product shall be placed on hold pending further assessment. Temperatures are to be re-checked on an hourly basis until acceptable. Air velocity in cold stores shall be moderate and no higher than necessary to achieve uniform temperatures within the rooms.

4.4.3.10 Product should be stacked so that air circulation within the storage room is not impaired. Except in jacketed rooms no direct contact with ceilings and floors shall be allowed.

4.4.3.11 Transport of frozen fish shall be done so as to ensure the fish remain frozen

4.4.3.12 Rises in temperature of frozen fish that occurs during storage or processing shall be reduced to -18°C or colder as quickly as possible.

4.4.3.13 The temperature of frozen fish for export shall not go above -18°C with only a brief upward fluctuation of 3°C allowed for no longer than 2 hours.

4.4.4 Storage and Transport

4.4.4.1 Food Carriers

4.4.4.1.1 The company shall verify that carriers of food products are suitable for the transportation of food. This shall include:

a. Inspection of carriers to ensure they are free from contamination and suitable for the transportation of food.
b. Carriers are loaded, arranged and unloaded in a manner that prevents damage and contamination of food and packaging materials.
c. Incoming materials (food, non-food, and packaging) are received in an area separate from the processing area.

4.4.4.2 Non-food Chemicals Receiving and Storage

4.4.4.2.1 Chemicals shall be received and stored in a dry, well-ventilated area.

4.4.4.2.2 Non-food chemicals shall be stored in designated areas such that there is no possibility for cross contamination of food or food contact surfaces.

4.4.4.2.2 Where required for on-going use in food handling areas chemicals shall be stored in a manner that prevents contamination of food, food contact surfaces or packaging materials.

4.4.4.2.3 Chemicals shall be stored and mixed in clean, correctly labelled containers.

4.4.4.2.4Chemicals shall be dispensed and handled only by trained personnel.

4.4.5 Transportation

4.4.5.1 Vehicles used for the transportation of chilled or frozen fish shall:

a. Be clean and maintained in a state that will prevent contamination;
b. Be covered during the transporting of the product in order to prevent exposure to dust, birds, insects and sunlight;
c. Be of adequate size
d. Be constructed and equipped in such a way that the temperature requirements laid down in these Standards can be maintained throughout the period of transport
e. For journeys exceeding one hour, vehicles shall be insulated, designed and equipped to maintain fish in a chilled or frozen state;
f. Keep fish products for animal consumption clearly separate from fish and fish products and so that any risk of contamination is minimised;
g. Have internal surfaces of the cargo area constructed from smooth, corrosion resistant, impervious materials free from cracks and crevices. The use of wood is not permitted unless it is painted with gloss paint of a light colour and the fish are carried in fish boxes;
h. Have internal surface joints that are smooth or flush and sealed to prevent the entry of moisture;
i. Be proofed against pests and dust;
j. Have adequate drainage if ice is used to chill the products, in order to ensure that water from melted ice does not stay in contact with the products
k. Ramps, if provided, shall not be stowed in the cargo area;
l. If lighting is supplied, the light source shall be covered by a shatterproof shield;
m. Never carry animals in the cargo area.
n. Where applicable, seafood products shall not be transported with other goods that may cause a risk of contamination.

4.5 Repairs and Maintenance

4.5.1 All facilities should have in place a documented repair and maintenance programme to ensure that regular preventative maintenance is carried out and faulty or broken plant and equipment is fixed in a suitable timeframe.

The repairs and maintenance programme could include a register that shows identification of the problem, details of how the item is to be fixed, the target date for completion and actual completion date. There must be good reason to explain the reason for delays when the target dates for completion are not met.

4.5.2 Repairs shall be carried out as soon as possible without interference to handling or processing and may cause the facilities closure during certain repairs.

4.5.3 Planned actions shall be scheduled in a timetable to demonstrate the commitment to future actions.

4.5.4 Responsibilities and authorities have to be established for implementing, maintaining, monitoring and verifying the maintenance plan.

4.5.5 Procedures must be established to ensure that maintenance will be done in such a way that the risk of contamination of the products is eliminated. A regular preventative maintenance programme must be implemented, whereby equipment, utensils and premises are regularly reviewed for signs of wear and tear and where deficiencies are detected prior to a problem occurring.

4.5.6 These schedules and timetables shall be available to the Competent Authority and checked for execution during on-site CA inspections.

4.5.7 Defective plant and equipment that is likely to cause contamination of plant and/or equipment should be rectified immediately whereas plant/equipment that is not likely to cause contamination of product will be allowed more time.

4.5.8 In all instances contamination of product should be avoided and corrective action taken to ensure that recurrence does not occur.

4.6 HACCP

4.6.1 General

4.6.1.1 All fish and fish products produced for export from land-based establishments and EU approved vessels shall be produced in accordance with an approved and documented HACCP programme.

4.6.1.2 It is a requirement that a logical approach for food safety be followed based on the seven principles of HACCP. These principles are:

i) identification of hazards, analysis of risks and determination of measures necessary to control them;
ii) identification of Critical Control Points;
iii) establishment of Critical Limits for each Critical Control Point;
iv) establishment of Monitoring procedures;

v) establishment of Corrective Action to be taken when Monitoring indicates that there is a deviation in control parameters;

vi) establishment of Verification and review procedures

vii) establishment of Documentation concerning all procedures and records.

4.6.2 Contents of HACCP Plan

4.6.2.1 The HACCP plan shall be developed for each product manufactured by the establishment.

4.6.2.2 Such a programme should include the following as a minimum:

a. Company description including company name, address, overall person responsible, contact details.

b. Scope of the HACCP plan. Namely; what products/processes are covered and where the processes start and finish.

c. A company organisation chart or information covering personnel with key responsibilities under the HACCP plan.

d. A company HACCP policy signed by an authorised company representative.

e. HACCP team members, their responsibilities and background.

f. References used to develop or support the HACCP plan.

g. Product description or specification including method of preparation and storage, intended use, product characteristics, target consumer group, packaging, additives and ingredients and method of distribution or storage.

h. Process flow clearly showing all steps in the process as well as inputs (either in the flow or elsewhere in the HACCP plan) and process variations as applicable to each step. The flow shall be verified by an authorised company person.

i. Identification of any hazards (raw material and process) that must be prevented, eliminated or reduced to acceptable levels;

j. Identification of biological, chemical and physical hazards for process steps.

k. Analysis of hazards for significance (likelihood and severity).

l. Identification of appropriate critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels

m. Establishment of critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards. Limits must be scientific or validated, measurable and allow adequate control of the hazard.

n. Documentation of effective monitoring procedures at critical control points covering who, what, how and when for each aspect monitored. Monitoring frequency should allow adequate control of the hazard.

o. Documentation of corrective actions when monitoring indicates that a critical control point is not under control. Corrective action to cover action taken to rectify the cause as well as product disposition and responsibilities. Actions to prevent recurrence also covered where possible.

p. Documentation of procedures, which shall be carried out regularly, to verify that the measures outlined in subparagraphs (a) to (i) are working effectively. The procedure must

cover record review, internal audit, annual review, product testing and calibration with “who, what, how and when being covered for each element of verification.

q. Establishment of a document and records procedure commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined in subparagraphs (a) to (h). Documents and records must include date and/or version number for document control. Records must record date and time of observation and the signature of the person performing the check.

4.6.3 Approval of HACCP Plans

4.6.3.1 The HACCP programme must be signed and dated by an authorised company representative and an authorised CA inspector. When the HACCP plan is signed by the company representative it represents management’s acceptance and commitment implementing the plan.

4.6.3.2 HACCP programmes shall also be subject to annual review, or more frequently if changes occur in the product or process. The review must be completed by company personnel who have completed a HACCP course approved by the ICO.

4.6.3.2 The annual review shall consider the following:

a. Review of records pertaining to the HACCP plan including monitoring records, corrective action records, supporting system records and product test results to demonstrate compliance and production of safe product.
b. Review of non-conformances in particular recurring non-conformances
c. Review of customer complaints for food safety reasons
d. Consideration of any food safety recalls in the past 12 months
e. Review of legislative requirements to identify legal requirements that may have changed since the HACCP plan was written.
f. Review of the process to determine any changes made since the HACCP plan was written.

4.6.3.3 Should changes be made to the approved HACCP plan, these changes must be documented and copy of revised be sent to the CA for updating its HACCP File.

4.7 Specific Processing Requirements

4.7.1 Checks on Incoming Raw Material and Other Inputs

4.7.1.1 Packaging

4.7.1.1.1 Packaging shall be checked before use for cleanliness and absence of contamination.

4.7.1.2 Ice

4.7.1.2.1 Ice shall be made from potable water or clean seawater and be free from contamination at the point of use.

4.7.1.3 Ingredients

4.7.1.3.1 Ingredients shall be food grade, free from contamination and meet importing country requirements.

4.7.1.4 Fish

4.7.1.4.1 Premises shall receive fish according to a documented and approved “Reception of Fish” programme. This programme shall cover checks, and resulting records, for each incoming batch of fish as follows:

a. Evidence of spoilage, contamination or other deterioration
b. Evidence that the fish has been adequately chilled or frozen from the time of catching or harvesting to the time of arrival at the processing premises
c. Labelling of each incoming batch of fish to allow trace back where required
d. Action to be taken whenever non-compliances occur against the documented programme
e. Records to be kept
f. Responsibilities under the programme

4.7.2 Canning

4.7.2.1 Premises operating low acid canned foods production must meet the following criteria:

a. Supervision of the canning process is under a person who has successfully completed an approved Low Acid Canned Foods Supervisors course (or equivalent)
b. A scheduled process for low acid canned foods shall be established by qualified persons having expert knowledge of thermal processing requirements for low acid canned foods packed in hermetically sealed containers. A “Standard Operating Procedure” Manual (or equivalent title) shall be documented and cover the following:
    i) Establishment of the thermal process with heat penetration and distribution studies and data
    ii) The process control system covering a description of the equipment and monitoring requirements
    iii) Container integrity checks and documentation including incoming containers, seaming machines, double seam integrity, cooling water monitoring, can cooling controls, post-process handling of containers
    iv) Documentation and records covering processing and production records, management review of records and process deviation records.
    v) The scheduled process must be approved by the CA and follow the requirements as laid down in Title 21 of the US Food and Drug Administration Code of Federal Regulations Part 113
    vi) Canning conditions shall comply with the following requirements:
        - The water used for the preparation of cans must be potable water
        - The process used for heat treatment must be appropriate having regard to heating time, temperature, can filling, size of containers with records being kept of each
        - The heat treatment must be capable of killing or inactivating pathogenic micro-organisms and their spores

- The heating equipment must be fitted with devices for verifying whether the containers have in fact undergone appropriate heat treatment
- Can cooling water must contain residual chlorine of at least 5 ppm

vii) The following checks must be carried out to verify the canning process:

- Incubation test studies at either 37^{o}C for seven days or 35^{o}C for ten days or any other equivalent combination
- Tear downs or similar tests to confirm the integrity of the double seam (put in specs as per PNG standards)
- Checks on cans to ensure the can seam is not damaged or jeopardised
- That all cans are traceable to an individual batch that relates to individual retort batches processed

c. The HACCP plan must include as CCPs:

i) Check weighing

ii) Seaming (as per can manufacturers recommendations)

iii) Retorting (with parameters and limits meeting scientific requirements and the manufacturers recommendations for the retort used)

iv) Cooling

Unless otherwise accounted for

d. The critical limits for each of the CCPs must be scientifically valid and data kept on site to prove this

e. Retort equipment must be of an approved type

f. The mercury-in-glass thermometer, retort gauges and any other critical measuring equipment must be calibrated at least annually

g. Heat sensor cards must be used in every retort basket or unit processed and must be held on file as part of the production records

h. The cannery shall be designed in such a way as to prevent retort baskets inadvertently missing the retort process

i. Cooling cans must be held in an area away from the main processing and people movement to prevent contamination

4.7.3 Fish Drying and Marinade

4.7.3.1 Premises doing fish drying and marinade must provide a separate area and must meet the following criteria:

a. Area used for drying and marinade must be clean so as to preclude contamination.

b. Any container or contact surfaces used for such operations must not preclude contamination during the actual activities.

c. Containers or areas used for such must be cleaned and securely stored before use

d. Wood that has been painted, varnished, glued or undergone any chemical preservation treatment must not be used for such activities

e. The process is to be carried out under an approved HACCP plan

f. Provides for adequate separation of the drying and marinade activities from the packing and other processing areas.

g. Further requirement for fish drying can be obtained from the Codex Alimentarius Standards for Fish and Fishery Products or the Competent Authority must be consulted for further information.

4.7.4 Thawing

4.7.4.1 Where thawing is carried out:

a. Fishery products must be thawed under hygienic and controlled time / temperature conditions. During thawing, the temperature of products must not increase excessively and must be monitored;

b. Fishery products shall be brought to their thawed state as quickly as possible without causing undesirable physical, biochemical and microbial changes to the food;

4.7.4.2 Thawing must be carried out so that product reaches temperate of a maximum temperature of 4.4 degrees or cooler.

4.7.5 Cooking of fish, shellfish and crustaceans

4.7.5.1 Where cooking of fishery products is carried out the following criteria shall be met:

a. Where products are being heated in any way, such as blanching or retorting, there shall be adequate control to ensure that the correct temperature / time regime is used to achieves the desired functionality and shelf-life without jeopardising consumer health.

b. Any cooking must be followed by rapid cooling. Water used for this purpose must be potable water or clean seawater. If no other method of preservation is used, cooling must continue until the temperature approaches that of melting ice.

c. Shelling, shucking or filleting must be carried out under hygienic conditions to avoid the contamination of product. Where such operations are done by hand, workers must pay particular attention to proper hand washing and all working surfaces must be cleaned thoroughly. If machines are used, they must be cleaned at frequent intervals and disinfected after each working day.

d. Cooked products must immediately be frozen or kept chilled at a temperature that will preclude the growth of pathogens, and be stored in appropriate premises.

e. Every manufacturer must carry out microbiological checks on its production.

4.7.6 Canning

4.7.6.1 When an establishment cans fish or fishery products the following criteria must be met:

- The provision of a documented scheduled process and Standard Operating Procedure Manual established by a qualified person having expert knowledge of the thermal processing for low acid canned foods packed in hermetically sealed containers and covering the following:
  a. Establishment of the thermal process with

i) heat penetration and
ii) heat distribution study

b. Process control system with:
i) equipment description
ii) monitoring system
iii) general operations in thermal process room

c. Container integrity checks:
i) incoming containers
ii) seaming machines
iii) evaluation of double seam integrity
iv) cooling water monitoring
v) cooling of containers
vi) post-process handling of containers

d. Documentation and records:
i) processing and production records
ii) management review of records
iii) process deviation records

- and shall be approved by the Competent Authority.

4.7.6.2 The Standard Operating Procedures Manual shall be based on the requirements laid down in Title 21 Food and Drugs, Code of Federal Regulations, Chapter 1, Food and Drug Administration, Department of Health and Human Services, Part 113, Thermally Processed Low-acid Foods Packaged in Hermetically Sealed Containers (21 CFR p.113).

4.7.6.3 Canning conditions shall comply with following requirements:

a. The water used for the preparation of cans must be potable water;
b. The process used for the heat treatment must be appropriate, having regard to such major criteria as the heating time, temperature, filling, size of containers, etc., a record of which must be kept;
c. The heat treatment must be capable of destroying or inactivating pathogenic organisms and the spores of pathogenic micro-organisms;
d. The heating equipment must be fitted with devices for verifying whether the containers have in fact undergone appropriate heat treatment; and
e. Potable water must be used to cool containers after heat treatment, without prejudice to the presence of any chemical additives used in accordance with good technological practice to prevent corrosion of the equipment and containers.

4.7.6.4 The following checks must be carried out to verify the canning process:

a. Checks must be carried out at random by the manufacturer to ensure that the processed products have undergone appropriate heat treatment:
   i) incubation test: incubation must be carried at 37°C for seven days or at 35°C for ten days, or at any other equivalent combination.
   ii) microbiological examination of the content of the containers in the establishment's laboratory or in another approved laboratory.

b. Samples must be taken of production each day at predetermined intervals, to ensure the efficiency of sealing or of any other method of hermetic closure. For that purpose, appropriate equipment must be available for the examination of cross-seams.

c. Checks are carried out in order to ensure that containers are not damaged.

4.7.6.5All containers that have undergone that treatment under practically identical conditions during the same period of time must be given a batch identification mark.

Note: Additional Requirements can be referred to Annex Six – Low Acid canned Food.

4.7.8 Packing

4.7.8.1Packing must be carried out under satisfactory conditions of hygiene, to preclude contamination of the fishery products.

4.7.8.2The time that elapses between processing and packaging shall not cause the food to suffer any undesirable physical, chemical or microbiological deterioration.

4.7.8.3 Labels, tags and adhesives used in packaging shall not contaminate food and a container of food for export shall not contain any foreign objects except the food.

4.7.8.4 Unused packaging materials must be stored in premises connected with the production area and protected from dust and contamination

4.7.9 Laboratory

4.7.9.1 For premises operating a laboratory on site the laboratory must be physically separated from processing areas with restricted access to approved persons only.

4.8 Training

4.8.1 All personnel who handle seafood shall undertake induction training (or training at commencement of employment) in the following areas:

- Personal hygiene and hygienic work practices
- Seafood safety and seafood spoilage

4.8.2 Refresher training on these topics shall be conducted on a regular basis for employees. Employees in key positions may also be required to complete specialised training. For example,

personnel developing, verifying or amending the documented HACCP plan must have attended a USFDA or equivalent HACCP training programme.

4.8.3 Records of training must be kept on file for each employee and records are to include the date of training, details of the training completed and any results or certificates.

4.8.4 Companies shall have a documented training programme that outlines:

- What training is required and by whom
- Frequency of training
- Who will conduct the training
- Who is responsible for identifying training needs

4.8.5 The operator, or a person delegated by the operator should review training requirements at least annually and keep a copy of this review on file.

4.9 Recall

4.9.1 Companies must document a Recall programme in the event that product is found to be non-compliant or injurious to health in the market place.

4.9.2 The documented Recall programme must cover:

a. Personnel responsible for the recall.
b. The situations in which a recall will be necessary.
c. Notification of the CA in the event of a recall (within 24 hours of deciding a recall in necessary)
d. The steps in the recall process from initial notification through to and including a review of recall effectiveness. The steps must ensure adequate control and separation of affected product throughout.
e. The need for a review of recall effectiveness.

4.10 Inventory Control and Traceability

4.10.1 It must be possible to trace, for inspection purposes, the plant of dispatch of consignments of fishery products, by means of labelling and by accompanying documents.

4.10.2Companies must document and operate an Inventory Control system that provides for the identification and tracking of product from initial catch through to final sale. The programme should provide for both physical tracing at all stages of processing as well as the ability to trace product via the records kept and product codes.

4.11 Internal Audit and Compliance

4.11.1 Internal Audit and Compliance System

4.11.1.1 Companies are required to conduct their own internal audits and compliance checks to demonstrate compliance with these Standards, their own HACCP plans, GMP's, SSOP or other pre-requisite programmes as well as any other requirements for export of seafood products from RMI.

4.11.1.2 Companies can develop their own monitoring system and records but companies must cover the following as a minimum:

4.11.1.3 Pre-requisite programme checks

AREA/ITEM	DETAILS
Building Exterior	Clean, tidy, good drainage etc.
Building Interior	Design, construction, maintenance, lighting, ventilation, waste disposal
Sanitary facilities	Employee facilities including hand washing & equipment cleaning and sanitising facilities
Water/Steam/Ice	Quality & supply
Transportation and Storage	Food carriers Temperature control Incoming Material Storage Non-food Chemical receiving & storage Finished Product storage
Equipment	Design & installation Food contact surfaces Equipment maintenance & calibration Maintenance records
Personnel	Training: general & specialised Health and hygiene
Sanitation and Pest Control	Sanitation programme & records Pest control programme & records
Product recall	Programme & records
Labelling	Correct & complete
Records	Clear, complete, accurate, legible, signed & dated
HACCP Plan	Current & complete Monitoring records available and as for records above Corrective actions taken as required Verification activities completed as required & showing production of safe food

4.11.2Records

4.11.2.1 Records from any Internal Audit and Compliance activities must be kept on file and made available to CA inspector on request.

4.11.2.2 Companies must not use twink/white out or red pen in completing such records.

Section 5: Product Standards and Export

5.1 Labelling

All fish and fish products intended for export shall be labelled with the following information:

5.1.1 Inner Cartons to be sold as Individual Items

- Product common name
- Date of production (may be in code)
- Country of origin (unless in the name and address of the licensed facility below)
- Name and address of licensed facility who produced the product
- Ingredient statement (if applicable)

5.1.2 Outer Cartons or Packaging and Inner Cartons

- Product common name
- Scientific name
- Date of production (may be in code)
- Country of origin (unless in the name and address of the licensed facility below)
- Name and address of licensed facility who produced the product
- Ingredient statement (if applicable)

5.1.2.1 The operator shall also take account of any overseas country requirements for labelling. In particular the requirements for labelling for products destined for the EU market given in Appendix Five or otherwise advised by importing authorities.

5.1.2.2 All the letters and figures must be fully legible and grouped together on the packaging in a place where they are visible from the outside without any need to open the said packaging.

5.2 Residues and contaminants

5.2.1 All residues (pesticides, antibiotics or other) and metals where applicable shall not exceed the limits as specified by importing country requirements. In particular the requirements for residue and contaminant monitoring for products destined for the EU market are given in Appendix Five.

5.3 Ingredients and Additives

5.3.1 General

5.3.1.1 All ingredients and additives added to fish shall be prepared so as not to present a risk to consumers.

5.3.1.2 Fishery products, intended to be placed on the market, must not contain sweeteners, colours, food additives others such as preservatives, antioxidant and phosphates other than those approved by national legislations, Codex Alimentarius and the relevant market requirement per intended products and are not (1) in excess of the permitted levels. any maximum quantity or proportion permitted by these Standards.

5.3.10 Ingredients and additives shall also meet the following requirements:

- Meet relevant overseas country requirements (documented evidence is required)

5.3.11 Storage and handling of ingredients or additives shall be according to manufacturer recommendations and also protect from contamination. They shall be labelled at all times.

5.4 Sampling and Testing

5.4.1 As a minimum for all exports of histamine-forming seafood products from RMI, the operator shall test as follows:

- Histamine: at least a minimum of 9 samples (determined as 1 sample) per a representative sample lot of every scombroid species handled every 4 months with the limit to not exceed 100 ppm unless otherwise required by overseas country legislation e.g. USA, European Union

5.4.2 In addition to this an operator is required to meet any overseas country sampling and testing requirements BEFORE export to that country. Refer to Appendix Five for Overseas Country Requirements.

5.5 Certification

5.5.1 General Requirements

5.5.1.1 Requirements of Operators

5.5.1.1.1 An operator intending to produce fish or fish product for export shall give at least 24 hours warning to the CA officer of their need for certification so that any necessary verification can be performed and export is not delayed unnecessarily.

5.5.1.1.2 An operator intending to produce fish or fish product for export is required to take all reasonable steps to ensure that the fish or fish product is not mixed with product that is not intended for export.

5.5.1.1.3 An operator intending to export fish or fish product must:

a) Carry out specific checks of the received fish or fish product against the market access requirements of the intended market(s), including transport conditions, product item marks, labels and any other identifying features;

b) Have a system of clear separation, and identification or traceability of fish or fish product during receipt, processing and subsequent storage,

c) Keep records of these matters to enable the usage and movement of the fish or fish product to be traced

d) Have a written programme that describes how these requirements will be met.

5.5.1.2 Requirements on Exporters

5.5.1.2.1 All exporters must ensure that the fish or fish product for export meets the requirements of both the importing country as well as RMI export standards.

5.5.1.3 Export Health Certificates

5.5.1.3.1 Export health certificates must be issued for every export of seafood from RMI by the authorised CA officers of the MIMRA

5.5.1.3.2 The MIMRA CA will issue three different types of certificates depending on the source of the product and the intended destination.:

1) An EU Health Certificate
2) A non-EU Health Certificate (General)
3) Relevant Importing Health Certificate as required.

Note 1: A summary of certificates to be issued in different circumstances is given in Appendix Three and covers:

a) product from an EU approved land-based establishment or vessel.
b) product from a non-EU land-based establishment or vessel

5.5.1.3.3 It is the exporters' responsibility to request export certificates. The request must be made at least 24 hours prior to the shipment being dispatched otherwise the exporter will be refused certification.

5.5.1.3.4 Only export certificates, produced on official MIMCA CA stationery, may be used.

5.5.1.3.5 The certificate must provide an accurate description of the identity of the approved processor of the goods, the type of fish being shipped, the quantity of product being shipped, and the final destination of the goods.

5.5.1.3.6 Export health certificates remain the property of Director of MIMRA until received by a foreign country.

5.5.1.3.7 The MIMRA (CA) has the right to refuse to issue an export health certificate in the following circumstances:

- The request for the certificate from the exporter is made more than 24 hours after the shipment left.
- The information supplied by the exporter is incomplete or inaccurate
- If the product fails to meet the requirements of these Standards or any other relevant RMI legislation
- If the inspector has any reason to doubt the information being supplied or the condition of the product

5.5.1.4 EU Certification

5.5.1.4.1 EU Health certificates will only be issued for product processed in establishments that are listed on the EU Approved Establishment list.

5.5.1.4.2 A single, original, fully completed EU Health certificate must accompany each shipment. A copy of the EU Health Certificate is given in Appendix 3 part 5. The legal background and example certificate are given in the EU Commission Implementing Regulation 1012/2012.[1]

5.5.1.4.3 The certificate provides the *official guarantees* from the CA to the EU regarding the relevant provisions of Regulations (EC) No 178/2002, (EC) No 852/2004, (EC) No 853/2004 and (EC) No 854/2004 and certify that the fishery products described were produced in accordance with those requirements, and in particular that they:

- Come from (an) establishment(s) implementing a programme based on the HACCP principles in accordance with Regulation (EC) No 852/2004,
- Have been caught and handled on board vessels, landed, handled and where appropriate prepared, processed, frozen and thawed hygienically in compliance with the requirements laid down in Section VIII, Chapters I to IV of Annex III to Regulation (EC) No 853/2004,
- Satisfy the health standards laid down in Section VIII, Chapter V of Annex III to Regulation (EC) No 853/2004 and the criteria laid down in Regulation (EC) No. 2073/2005 on microbiological criteria for foodstuffs,
- Have been packaged, stored and transported in compliance with Section VIII, Chapters VI to VIII of Annex III to Regulation (EC) No 853/2004,
- Have been marked in accordance with Section I of Annex II to Regulation (EC) No 853/2004,
- Have satisfactorily undergone the official controls laid down in Annex III Regulation (EC) No 854/2004.

> ***Note**: The EU requires certification of any samples of fish and fish products destined for human consumption. EU officials have confirmed that a certificate must accompany exports of fish products for personal use, of a weight greater than 1 kg.*

5.5.1.5 Obtaining an EU Health Certificate

5.5.1.5.1 The name and number of the establishment where the fish was processed for export to the EU must be recorded on the EU Health Certificate. It must be recorded as on the List of Establishments Approved to Export Fish to the EU (the EU List).

5.5.1.5.2 Information published on the EU List must match the information about the exporting establishment that is listed on the certificate and the product labels.

[1] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:306:0001:0018:EN:PDF

5.5.1.5.3 RMI exporters should ensure that their products are accompanied by the proper EU documentation prior to being exported from RMI if transhipped via another country.

5.5.1.5.4 Certificates would be raised using the certification database managed by the MIMRA CA at the Central at Majuro.

5.5.1.5.5 Certificates will be signed and stamped in ink that is a different colour than the remaining text on the certificate.

5.5.2 Records and Storage of Certificates

5.5.2.1 The operator must keep a record of the serial numbers of completed certificates.

5.5.2.2 A copy of the original signed certificate must be held by the KSVA for a minimum of FOUR years after the date of signing.

5.5.2.3 All copies and originals of certificates must be securely stored to prevent loss or damage.

5.5.3 General Provisions in Issuing Certificates

5.5.3.1 An export certificate as described by these Standards shall accompany all products destined for export.

5.5.3.2 Export certificates shall be issued by a CA inspector provided the requirements of any relevant legislation and any overseas market access requirements have been met.

5.5.3.3 Only licensed exporters may apply for export certificates.

5.5.3.4 Where the FVO is unfamiliar with a particular premise, he or she shall refer to previous CA audit reports to satisfy himself or herself that the premises comply with the requirements of the regulations and these standards before signing an export certificate.

5.5.3.5 Export certificates shall not be issued unless:

- The person has first-hand knowledge of the on-site operation to state that the information used in the export certificate is complete and accurate.
- The information provided by the exporter in incomplete, inaccurate, or otherwise, not in accordance with any requirement of the Act.
- The authorised person is satisfied that the information provided is correct and complete.

5.5.3.6 The Competent Authority may only issue one type of certificate for each consignment or lot.

5.5.4 Procedure for the Authorisation of the Export Certificates

5.5.4.1 Companies shall complete the application for export on line for non- EU market using the e-certification. Once the export lodgement is uploaded the CA officers gets the alert to verify and print out the HC for approval. The CA officer may board the vessel and or enter the premises to verify related products condition and documents in order to confirm particulars for certification.

5.5.4.2 EU exporters lodge export request via EU traces. Once uploaded the CA office gets and alert for validation. Hard copy of all documents is provided to the CA for verification. CA officer may decide to verify products and relevant reports and documents to confirm and certify the Health Certificate.

5.5.4.3 The CA Officers MUST view the latest audit report held on file in the CA Advisor office or in the secure filing area. The CA officer will only sign the HC if the premises intending to export to EU in in compliance with this Industry Standards (ISs), the National Control Plan including RMI Standards and related verification tests to ensure the product is fit for human consumption.

5.5.4.4 After verification checks are carried out, the CA officer will stamp the HC with an official stamp, that is kept in secure location. For EU HC, the stamp used is of a different colour then the rest of the documents. Stamps used are stored securely and authorised for access and use only by authorised CA officers. The purpose for this is to prevent the fraudulent generation of certificates or use by unauthorised persons, which has serious implications.

5.5.4.5 The Competent Authority reserves the right to view the loading of product or individual consignments of product. However, it is not a necessity that this is done PROVIDED the paper trail outlined above is correct.

5.5.4.6. The Senior CA Officer should delay signing of certificates (and may, indeed, view individual consignments or product loading) if there is any doubt of that particular consignment.

5.5.4.7 This certification process does NOT apply to product not intended for resale, not for human consumption, personal use or for consignments less than 1kg or otherwise exempt.

5.5.4.8 Certificates shall not be issued unless:

- The product has been packed, processed, labelled or stored in a licensed facility
- In the opinion of The Senior CA Officer, the product is fit for its intended purpose;
- Overseas market access requirements as defined in Section 5.6 and Appendix Five have been met.

5.5.4.9 In the event that certificates are cancelled or lost in some way, the operator shall ensure that a CA inspector is notified within 24 hours.

5.5.4.10 Where certificates are cancelled, operators shall ensure that documented evidence of cancellation is held on file.

5.5.4.11 Where certificates are lost, operators shall request a replacement certificate at additional cost to the operator. The cost of replacement certificates shall be determined by the Director on an annual basis.

5.5.4.12 After the Senior CA officer has signed the certificates for export, the original certificate must be submitted to the Customs prior to export.

5.5.5 Reissue of Certificates

5.5.5.1 Application for replacement export certificates made by the consignor must be made within 5 days of the vessel departure.

5.5.5.2 Requests for change will be decided on a case-by-case basis and will only be approved for genuine mistakes in the original health certificate or information required by the European Commission legislation.
5.5.5.3 Requests for health certificate replacements for marketing or sales-related activities will be declined.
5.5.5.4 Applications for a replacement health certificate must be made on the Request to Change Export Health Certificate Information given in Appendix Two.

5.5.5.5 Application for replacement export certificates made by the border inspection posts or other authorised persons must be made within the period of the voyage or shortly after arrival and inspection at the destination.

5.5.5.6 MIMRA Competent Authority is not able to provide replacement export certificates after this time. Product that remains longer tin a foreign country is under the jurisdiction of the foreign government, irrespective of whether or not it is in a Customs bond store.

5.5.5.7 The Certifying Officer will endorse the replacement export certificate set in the body of each document with the statement: "*Replacement of certificate No ….. Dated …… which is cancelled."*

5.5.6 Loss of Certificates

5.5.6.1 Where export certificates have been lost or inadvertently destroyed, the operator shall request a certified copy of the export certificate from the MIMRA Competent Authority, except where overseas market access requirements state that the country will not accept certified copies. To request a new health certificate the operator must complete the Request to Change Export Health Certificate Information form given in Appendix Two.

5.5.6.2 CA officer will only issue certified copies of certificates on receipt of a signed statement of the circumstances of the loss and the prescribed fee.
For instance, where a certified copy is unacceptable, the certificate shall be replaced. Replacement certificates must be endorsed at the bottom with the statement *"Replacement of certificate serial number……. dated…… which has been lost."*

5.5.6.3 The Senior CA Officer shall not issue a replacement certificate unless he or she is satisfied with the statement provided by the Operator requesting a replacement.

5.5.6.4 The same applies to the EU market, no replacement copy can be done on the EU traces by the CA officers unless the officer is satisfied with the reasons provided.

5.6 Overseas Market Access Requirements

5.6.1 **Appendix Five** gives individual country requirements for RMI seafood products. Exporters must meet these minimum requirements in addition to the additional requirements of these Standards in order to export to the required market.

SECTION 6: Vessels

General

Where RMI flagged vessels require product processed on board that is for direct export to the market and not via an approved land-based premises then those vessels shall meet the requirements laid down in these Standards for EU vessels given in section 5.6 and Appendix Five.

SECTION 7: Complaints, Appeals and Resolution of Disputes

Scope

This procedure covers any complaint or appeal against activities or actions resulting from implementation of the Fisheries Act and associated legislation (including these Standards) for SEAFOOD SAFETY AND CERTIFICATION issues only.

Procedure

1. Where any operator or licensee believes that requirement, direction or decision is demonstrably unfair, inaccurate or impinges on the operator/licensee's ability to conduct operations, they may make written application to the Director of the CA.
2. The operator or licensee is required to advise the CA verification and any other CA personnel directly affected, prior to any contact with the Director. The operator/licensee should be aware that the likely first action of the Director would be to seek the views of the CA Officer or other affected CA personnel.

3. The Director will consider the written challenge or appeal.
   In deciding on written appeals or challenges the Director is to consider:
   - Relevant legislation relating to the challenge or appeal and whether the challenge or appeal meets or contravenes with legislative requirements
   - Whether there has been any oversight or negligence on the part of the CA Officer involved
   - Whether the challenge or appeal has any impact on overseas country requirements
   - Impact on the remainder of RMI seafood industry
   - The severity of the challenge or appeal and whether it has a significant impact on the safety and wholesomeness of seafood products

4. The Director is to discuss the matter and his or her recommendation for resolution with the Minister of MFMRD prior to announcing the decision.

5. Should the matter not be able to be resolved with the Director and Minister's input the matter shall be placed in the hands of an independent arbitrator with the arbitrator's decision being final.

   The Director is to make a final decision (unless an arbitrator is required) on the outcome of the challenge or appeal. This decision is to be communicated to the complainant and the office of the Director of MIMRA CA in WRITTEN form and held on file by the Director of MIMRA or CA office
6. Any alterations to legislation and related documents resulting from the decision by the Minister must be made within four weeks of a decision being made.

7. The bottom section of the Challenge or Appeal form (see Appendix One) should be completed and held on file.

APPENDIX ONE: Complaint or Appeal Form

FULL NAME OF

COMPLAINANT………[2]

COMPANY OR LICENCE NO.………...

DATE OF COMPLAINT OR APPEAL………...

DESCRIPTION OF COMPLAINT OR APPEAL:

ACTIONS TAKEN TO DATE OVER COMPLAINT OR APPEAL:

REASONS FOR COMPLAINT OR APPEAL:

[2] Full name of complainant = person making complaint on behalf of company or individual

SUPPORTING INFORMATION OR DOCUMENTATION SUPPLIED:

FOR CA USE ONLY:

1. **Actions taken to resolve complaint or appeal:**

2. **Agreed Outcome to Complaint or Appeal:**

Signed:	**Signed:**
Complainant Name:	**CA Representative:**
Date:	**Date**

APPENDIX TWO (II): Application Forms for EU Operators

A. Exporter registration and listing

Application Form: Exporter registration and listing	**CA Verification**
1. Exporter Identification	
A unique identification will be assigned to each exporter. Refer form guidelines for criteria.	
Registration ID:	
2. Applicant Name:	
Registered company name or partnership names (including the trading name) or individual name.	
Full legal name:	
3. Business Address and Contact Details:	
Physical (for service/delivery of items):	
Phone No:	
Fax No:	
Postal (for communication):	
E-mail:	
4. Processing Establishment Address(es) and Contact Details:	
Only complete if the Processing establishment details are different from the business address in Section 3.	
Legally registered address:	
Phone No:	
Fax No:	
E-mail:	
5. Type of listing: Tick [.] as many product categories as are applicable	

Exporter	**Supplier**
[ ] Processing Establishment	[] Fishing Vessel [ ] *Coastal* [] *Off Shore* [] *Reefer*
[] Fishing Vessel	
[] Cold Store	[] Cold Store
	[] Ice Factory
	[] Transporters
Type of Product	
[] Wild Caught [ ] *Fresh/Frozen* [] *Smoked* [ ] *Conserved*	Others: *(specify)*
Markets sought: [] EU [ ] Other (see over)	Others: *(specify)*

6. Applicant Declaration: *To be completed by applicant*. I declare that:	
(a) I am authorised to make this application as the exporter or person with legal authority to act on behalf of the exporter; and	
(b) the information supplied in this application is truthful and accurate to the best of my knowledge; and	
(c) I accept that due to the voluntary basis of this registration, it would be expected from the company to comply with production and compliance standards, as well as verification frequency that could exceed the requirements of the prevailing Republic of the Marshall Islands legislation, and	
(d) I accept that verifications and control of Fish &Fishery Products processing establishments exporting fish and fishery products, will as be performed by the Marshall Island Marine Resource Authority as the Competent Authority (CA), and	
(e) I accept that the obtaining of this registration is conditional to a positive outcome of a verification visit performed by Competent Authority against standards lay down under the relevant regulations and the contents of the National Control Plan issued and managed by the CA, and	
(f) I accept that maintaining this registration as part of the listing of companies allowed to export of fish and fishery products, is dependent on continuous regulatory compliance and ongoing performance against standards lay down under the relevant legislation (including overseas market access requirements) and the contents of the National Control Plan issued and managed by the CA, and	
(g) I accept that receiving health certificates that this registration entitles me, is dependent on regulatory compliance and on-going performance against standards lay down under the relevant legislation (including overseas market access requirements) and the contents of the National Control & Export Protocol issued and managed by the CA	
Name:	**Date:**
Designation:	**Signature:**
Attachments: Product flow diagram HACCP plan Equipment and Facilities details	 Site plan Supporting programmes Details of services (water, power etc.)
Notes Section 1: A unique identification will be assigned to each exporter and must not be the same as any other identification used in regard to any other activity regulated under these regulations. In case the applicant holds identification as an exporter to the EU under prior verification regimes, this ID would be maintained.	
Official Use Only: Approved/Not approved: Date: Signed: MIMRA CA Stamp:	

B. Amendments to Approval Details

Application Form: Exporter registration and listing		
1. Exporter Identification		
Registration ID:		
2. Applicant Name:		
Registered company name or partnership names (including the trading name) or individual name.		
Full legal name:		
3. Business Address and Contact Details:		
Physical (for service/delivery of items):		
Phone No:		
Fax No:		
Postal (for communication):		
E-mail:		
4. Processing Establishment Address(es) and Contact Details:		
Only complete if the Processing establishment details are different from the business address in Section 3.		
Legally registered address:		
Phone No:		
Fax No:		
E-mail:		
5. Type of listing: Tick [.] as many product categories as are applicable		
Exporter	**Supplier**	
[] Processing Establishment	[] Fishing Vessel [ ] *Coastal* [] *Off Shore* [] *Reefer*	
[] Fishing Vessel		
[] Cold Store		
	[] Cold Store	
	[] Ice Factory	
	[] Transporters	
	[] Landing site	
Type of Product		
[] Wild Caught [ ] *Fresh/Frozen* [] *Smoked* [ ] *Conserved*	Others: *(specify)*	
Markets sought: [] EU [ ] Other (see over)	Others: *(specify)*	

6. Details of change: Tick [.] as many categories as are applicable	
(a) Change in HACCP plan information	
(b) Change in SSOP/pre-requisite programme information	
(c) Change in market destination	
(d) Change in products, species, processing categories	
(e) Change in processing plant or EU vessel layout, design or construction	
(f) Change in legal ownership or company name	
(g) Other: please specify in the space below:	
7. Company Information Supplied: Tick [.] as many product categories as are applicable	
(a) Amended documentation including, as relevant, HACCP plan, SSOPs or pre-requisite programmes	
(b) Amended factory or vessel layout or design and construction details	
(c) Amended approval information (from page 1 of this form) including change in ownership, change in market destination, species being processed or processes carried out	
(d) Other information: please specify in the space below	
8. Operator Statement	
(a) I am authorised to make this application as the exporter or person with legal authority to act on behalf of the exporter; and	
(b) the information supplied in this application is truthful and accurate to the best of my knowledge; and	
(c) I request the update of my company file within the Competent Authority	
Name:	**Date:**
Designation:	**Signature:**
Official Use Only: Approved/Not approved: Date: Signed: MIMRA CA Stamp:	

C. Request to Change/Re-issue Export Health Certificate Information

Application Form: Health Certificate Information	
Original Health Certificate Ref. No.:	
Change/Re-issue Required: **(please be as specific as possible giving actual replacement information required). MIMRA CA reserves the right to refuse the re-issue of a health certificate**	
Company Justification for Change:	
FOR MIMRA CA USE ONLY:	
Request approved or denied: (circle as appropriate): APPROVED DENIED	
Reasons:	
Replacement Certificate No.:	
Signature of certifying officer:	
Name of certifying officer:	
Date:	

Please complete return to Eugene Todd Gold

E-mail : etgold@mimra.com

D. Vessel Data Sheet

Vessel Data Sheet				**F25**
Date:		Inspection Place:		
Time Spent on Inspection		From:	To:	Hours:

Vessel Details			
Vessel Name:		Registration Number:	
Flag Country:		Inspection Ref.:	
Vessel Approval Reference Number:		Vessel Approval Date:	
Vessel Owner:			
Name:		Telephone:	
Address:			
Quality Manager:			
Name:		Number of Crew:	
Vessel Type	[] Transport [ ] Factory [ ] RSW [ ] Ice [ ] Brine [ ] Freezer		
Fishing Methods	(A vessel can have multiple fishing methods)		
	Type 1: Trawler		
	Type 2: Long line		
	Type 3: Pole and line		
	Type 4: Purse seiners		
	Type 5: Gill netting		
	Type 6: Deep Sea Fishing		
	Type 7: Other (Please specify):		

APPENDIX THREE: Forms and Certificates for Fish and Fish Product Exports

1. Health Certificate Export Information form

Destination of Export (please circle): European Union Non-European Union

I.1. Consignor Name Address Postal code Tel. No.		I.5. Consignee Name Address Postal Code Tel. No.	
I.7. Country of origin ISO Code	1.8. *Region of origin* Code	I.9. Country of destination	ISO Code I.10.
I.11. Place of origin Name: Approval number: Address:		I.12.	
I.13. Place of loading		I.14. Date of departure	
I.15. Means of transport (please circle) Aeroplane Ship Railway wagon Road vehicle Other (please specify) Identification: Documentary references		I.16. Entry BIP in EU I.17.	
I.18. Description of commodity		I.19. Commodité code (HS code) I.20. Quantity	
I.21. Temperature of product (please circle) Ambient Chilled Frozen Brine Frozen		I.22. Number of packages	
I.23. Identification of container and seal number		I.24. Type of packaging	
I.25. Commodities certified for: Human consumption ☐			
I.26.		I.27. For import or admission into EU ☐	

I.28. Identification of the commodities

Specie (Scientific name)	Nature of commodity	Treatment type	Approval number of establishments: Manufacturing plant	Number of packages	Net weight

Veterinary certificate to EU

Part I: Details of dispatched consignment

I.1. Consignor Name Address Tel.			I.2. Certificate reference No		I.2.a.
			I.3. Central competent authority		
			I.4. Local competent authority		
I.5. Consignee Name Address Postcode Tel.			I.6.		
I.7. Country of origin	ISO code	I.8. Region of origin Code	I.9. Country of destination	ISO code	I.10
I.11. Place of origin Name Address	Approval number		I.12.		
I.13. Place of loading			I.14. Date of departure		
I.15. Means of transport Aeroplane ☐ Ship ☐ Railway wagon ☐ Road vehicle ☐ Other ☐ Identification Documentation references			I.16. Entry BIP in EU		
			I.17.		

I.18. Description of commodity	I.19. Commodity code (HS code)	
	I.20. Quantity	
I.21. Temperature of product Ambient ☐ Chilled ☐ Frozen ☐	I.22. Number of packages	
I.23. Seal/Container No	I.24. Type of packaging	
I.25. Commodities certified for: Human consumption ☐		
I.26.	I.27. For import or admission into EU ☐	

I.28. Identification of the commodities

Species (scientific name)	Nature of commodity	Treatment type of establishement	Approval number	Manufacturing plant	Number of packages	Net weight

COUNTRY **Fishery products**

II.	Health information	II.a. Certificate reference number	II.b.

II.2.3.3. the consignment is identified by a legible label on the exterior of the container, or when transported by well boat, in the ship's manifest, with the relevant information referred to in boxes I.7 to I.11 of Part I of this certificate, and the following statement:

"([4]) **[Fish]** ([4]) **[Crustaceans] intended for human consumption in the Union**".

Notes

Part I:

— Box reference I.8: Region of origin: For frozen or processed bivalve molluscs, indicate the production area.

— Box reference I.11: Place of origin: name and address of the dispatch establishment.

— Box reference I.15: Registration number (railway wagons or container and lorries), flight number (aircraft) or name (ship). Separate information is to be provided in the event of unloading and reloading.

— Box reference I.19: Use the appropriate Harmonised System (HS) codes of the World Customs Organisation of the following headings: 0301, 0302, 0303, 0304, 0305, 0306, 0307, 0308, 05.11, 15.04, 1516, 1518, 1603, 1604, 1605 or 2106.

— Box reference I.23: Identification of container/Seal number: Where there is a serial number of the seal it has to be indicated.

— Box reference I.28: *Nature of commodity:* Specify whether aquaculture or wild origin.

Treatment type: Specify whether live, chilled, frozen or processed.

Manufacturing plant: includes factory vessel, freezer vessel, cold store, processing plant.

Part II:

([1]) Part II.1 of this certificate does not apply to countries with special public health certification requirements laid down in equivalence agreements or other Union legislation.

([2]) Part II.2 of this certificate does not apply to:

(a) non-viable crustaceans, which means crustaceans no longer able to survive as living animals if returned to the environment from which they were obtained,

(b) fish which are slaughtered and eviscerated before dispatch,

(c) aquaculture animals and products thereof, which are placed on the market for human consumption without further processing, provided that they are packed in retail-sale packages which comply with the provisions for such packages in Regulation (EC) No 853/2004,

(d) crustaceans destined for processing establishments authorised in accordance with Article 4(2) of Directive 2006/88/EC, or for dispatch centres, purification centres or similar businesses which are equipped with an effluent treatment system inactivating the pathogens in question, or where the effluent is subject to other types of treatment reducing the risk of transmitting diseases to the natural waters to an acceptable level,

(e) crustaceans which are intended for further processing before human consumption without temporary storage at the place of processing and packed and labelled for that purpose in accordance with Regulation (EC) No 853/2004.

([3]) Parts II.2.1 and II.2.2 of this certificate only apply to species susceptible to one or more of the diseases referred to in the heading of the point concerned. Susceptible species are listed in Annex IV to Directive 2006/88/EC.

([4]) Keep as appropriate.

([5]) For consignments of species susceptible to EHN, Taura syndrome and/or Yellowhead disease this statement must be kept for the consignment to be authorised into any part of the Union.

COUNTRY **Fishery products**

II. Health information	II.a. Certificate reference No	II.b.

(6) To be authorised into a Member State, zone or compartment (boxes I.9 and I.10 of Part I of the certificate) declared free from VHS, IHN, ISA, KHV or Whitespot disease or with a surveillance or eradication programme drawn up in accordance with Article 44(1) or (2) of Directive 2006/88/EC, one of these statements must be kept if the consignment contain species susceptible to the disease(s) for which disease freedom or programme(s) apply(ies). Data on the disease status of each farm and mollusc farming area in the Union are accessible at http://ec.europa.eu/food/animal/liveanimals/aquaculture/index_en.htm.

— The colour of the stamp and signature must be different to that of the other particulars in the certificate.

Official inspector

Name (in capital letters): Qualification and title:

Date: Signature:'

Stamp:

License No.

Marshall Islands Marine Resource Authority

PO BOX 860 – Majuro

+692 625 8262

HEALTH CERTIFICATE

Date of Lodgement:

Country of Origin:

Consignor (Name of shipper and Address)

License No.

Invoice No: _____ 5. Port of Dispatch: _____6. Means of conveyance**:** _____

7. Description of Goods (Common, Scientific names, Qty, Value, Presentation)

Common/Scientific Name	Quantity (Weight)	Value	Presentation & Temperature of storage or transport

8. Consignee: (Name and Address), Destination of Products

Name and Address	
Country of Destination	
Container No: Seal No as applicable	

Declaration

The product (s) described above was /were caught or harvested, handled or processed at all times in accordance with Title 51 – Marine Resource Act 1997 and the Fish Processing and Fish Export Regulation and other applicable legislation.

Signature of the Consignor

……

For Official Use Only

Marshall Island Marine Resource Authority Declaration as the Competent Authority.

The product(s) described in this form have been inspected in accordance with the requirements of the Title 51 Marshall Islands Marine Resource Authority, and the products(s) is /are; certified free of visible lesions and infectious disease; is fit for human consumption and/or use:

and approved for export.

Certifying Signatory _____ official Seal

Hygienic Handling Certificate

HYGIENIC HANDLING CERTIFICATE

Serial no.

Marshall Islands Marine Resource Authority
PO BOX 860 – Majuro
+692 625 8262

Export certificate ID no.		Date	

Section 1. Fishing vessel identity

Vessel name	**Flag state**	**Fishing Authorization**	**Fishing licence validity**	**Licenced fishing areas**	**FFA Vessel Reg**

Section 2. Products Exported

Line #	Species	Product type	Product weight in kg	Containers ID or Bulk Carrier
1				
2				
3				
4				
Totals				*Number of containers*

Description of product	Species (scientific name)	Nature of commodity	Manufacturing Plant	Type of packaging	Number of packages	Net weight

Part II: Certification

II. Health Attestation

The undersigned certifying officer hereby certifies that:

a. the fish were processed in a premise approved by and under the control of the RMI competent authority;
b. have been caught, landed, where appropriate packaged, handled, marked, prepared, processed, frozen, thawed, stored and transported under conditions laid down in the RMI Fish Processing and Export Regulation 2020 and the RMI Industry Standards, laying down the health conditions for the production and the placing on the market of fishery products
c. have undergone health controls;
d. do not come from toxic species or species containing biotoxins;
e. the products have been handled, processed, identified, stored and transported under an approved HACCP (Hazard Analysis and Critical Control Point) and sanitary programme consistently implemented and in accordance with the requirements laid down by Competent Authority
f. the fish were wild caught and not grown or harvested in an aquaculture system at any stage
g. the consignment does not contain any other product species

the fish is intended for human consumption only, not intended for aquaculture, bait, animal feed or fertilizer

.

Official Inspector

Name: Qualification and title:

Date: Signature:

Stamp:

Ph: +
Fax: +
E-mail: **etgold@mimra.com**

7. Certification Ruling

Fishing Vessel	***EU Listed***	***Package***	***Transport (foreign flagged)***	***EU Listed***	***Additional Comments***	***Destination***	***Health Certificate Type***	***Comments***
RMI flagged	YES	Bulk (separation net)	Carrier	NO		Non-EU	National Health Certificate	
	YES	Bulk (separation net)	Carrier	NO	Not going direct to EU	EU	National Health Certificate	
	NO	Bulk (separation net)	Carrier	NO		Non-EU	National Health Certificate	If CA do inspection of trans-shipment in port
	NO	Bulk (separation net)	Carrier	NO	Not going direct to EU	EU	National Health Certificate	If CA do inspection of trans-shipment in port
RMI flagged	YES	Container	Container Ship	NO	Going direct to non-EU	Non-EU	National Health Certificate	
	YES	Container	Container Ship	NO	Going direct to EU	EU	EU Health Certificate	
	NO	Container	Container Ship	NO	Going direct to EU	Non-EU	National Health Certificate	Subject to inspection of vessel records and container loading
	NO	Container	Container Ship	NO	Currently irrelevant in RMI Going direct to EU	EU	Non-EU éligible because Vessel not EU listed	

Fishing Vessel	***EU Listed***	***Package***	***Transport (foreign flagged)***	***EU Listed***	***Additional Comments***	***Destination***	***Health Certificate Type***	***Comments***
Foreign Flagged	YES	Bulk (separation net)	Carrier	Non-EU		Non-EU	No Health Certificate	We can provide a Hygienic Handling Certificate
	YES	Bulk (separation net)	Carrier	EU	Direct shipment to EU	EU	No Health Certificate	
	NO	Bulk (separation net)	Carrier	Non-EU		Non-EU	No Health Certificate	
	NO	Bulk (separation net)	Carrier	EU	Direct shipment to EU	EU	No Health Certificate	
Foreign Flagged	YES	Container	Container Ship	NO		Non-EU	No Health Certificate	We can provide a Hygienic Handling Certificate
	YES	Container	Container Ship	NO	Direct shipment to EU	EU	No Health Certificate	We can provide a Hygienic Handling Certificate
	NO	Container	Container Ship	NO		Non-EU	No Health Certificate	We can provide a Hygienic Handling Certificate
	NO	Container	Container Ship	NO	Direct shipment to EU	EU	Ineligible for EU market	Ineligible for export to EU

APPENDIX FOUR: Internal Audit and Compliance Programme for MIMRA CA Exporters

Background

RMI exporters need to implement an internal audit programme in order to demonstrate compliance with the Industry Standards (ISs) and to complement CA MIMRA external audits. This document outlines how a seafood exporter may set up an internal audit programme.

Details of Programme

Audit Checks

Audit checks will be divided up into checks of the following frequency:

- Daily
- Weekly
- Monthly
- 6-monthly

the details of which are detailed in the attached forms.

Compliance, deficiency types and corrective action classification

For each item inspected the compliance results are defined as:

NC (Non-Compliance)

The non-compliance clearly does not meet the requirements of this standard or is subjecting the product to an unacceptable level of exposure to any food safety hazard that jeopardizes the fitness for purpose as food.

The non-compliance must be corrected immediately and the exposed product shall be dealt accordingly. If the exposure justifies it, production shall not resume until satisfactory control measures are put in place.

In the case of a non-compliance that causes direct contamination of the fish, this shall be further classified as a “CRITICAL” or noted as NC/C and production ceased immediately until the situation is rectified to the satisfaction of the CA officer/ inspector. Any affected product must be isolated and subject to further testing and only released in the case of satisfactory test results.

Partial Compliance (Compliance with observations)

The issue is under substantial compliance; however, there are particulars that if not controlled could subject the product to an unacceptable level of exposure to any food safety hazard that could jeopardize the fitness for purpose.

These non-compliances shall be corrected before next verification. If the issue under scrutiny is a usual recurrence, it may grant a NC result.

FC (Full Compliance)

The issue under regulatory verification is under full compliance.

Pre-Operation Check Sheet

Week Starting: _____

Item to Check	Mo	Tu	We	Th	Fr	Sa	Sun
Fish processing room, floors, drains, walls, tables, equipment, scales etc. – all smell & look clean, and are tidy and ready for processing?							
Plenty of hand soap & hand towels in processing rooms, toilets etc.?							
Fly zappers clean?							
Premises free from any signs of vermin activity?							
Chlorine level in water not less than 0.3 ppm?							
Sanitisers made up & correct strength?							
Landing area & scales clean and tidy?							
Chiller – smell & look clean, no condensation, all product off the floor?							
Chiller temperature checked?							
Carton storage – area clean & tidy and packaging correctly stored?							
Personnel wearing correct protective clothing & following correct procedures?							
Other -							
(a) Checker Sign							

Non-Compliance Record

Day	Non-compliance	Corrective Action Taken	Signed

Signed (Internal Audit Check): _____ **Date:** _____

Daily/Weekly Check Sheet

Week Starting: _____

Daily Checks	Requirements	Mo	Tu	We	Th	Fr	Sa	Sun
Reception of product	Reception checks completed for each batch?							
Incoming Goods	Transported & arrived in a suitable condition?							
Premises	In good state of repair, generally clean and tidy, any maintenance required? No signs of vermin activity?							
Personnel Hygiene	All staff observing correct procedures (protective clothing, health, hand washing, hygienic work practices, etc.)?							
In-Process Product	Checked and ok – processed to company requirements, correct temp during processing?							
Contamination	Product not at risk of contamination from water splash, non-potable water, equipment, bins or containers, appliances, dropped product?							
Final product Packaging & Labelling	Packaging clean and undamaged, product packed & labelled correctly – correct information on the label and the correct label on the package? Final product meets customer/company specifications?							
Waste Removal	Waste removed regularly & not creating a risk of contamination?							
Clean & Sanitation Programme	Cleaning & sanitation at breaks and at end of processing appropriate and as per programme?							
Chemicals	Use in accordance with manufacturer's instructions?							
Chiller/Freezer	Clean & tidy, product not at risk of contamination? Temperature checked & OK?							
Transport Vehicles	All checked & OK prior to loading product (condition, cleanliness, temp. & refrigeration equipment)?							
Product Load out	Temperature of product checked & recorded on Temperature Monitoring Record?							
Amenities & Packaging Store	Checked - clean & tidy? Packaging protected from contamination, stored off the floor, etc.?							
	Company Checker's Signature							

Weekly/Monthly Checks	*Requirements*	*Company Checker*
Environs	Weekly check – area tidy and no risk of product contamination	
Chiller/Freezer	Cleaned and sanitised at least 2 x weekly	
Ice Room	Clean & tidy, cleaned & sanitised if empty?	
Maintenance	Check any problem areas for maintenance required, including equipment, leaks, hoses, sign off any work completed.	
Vermin	Is monthly check of bait stations, fly screens up to date?	
Water monitoring	Is monthly water test up to date?	
Certification/OMARS (other market access requirements)	Check any new requirements implemented.	
Chemicals	Chemicals (cleaning, maintenance, vermin control etc.) are stored and labelled correctly?	

Signed (Internal Audit Check): _____Date

Checkers Comments

Details of Non-Compliance	Corrective Action to be taken	To be completed by (time)	Completed - date/time? fixed?	Internal Audit check

6 Monthly Internal Audit Checks

Have the following been done.....?	Yes/No Action
Internal verification activities up-to-date? Any continual problems?	
Any new legislative requirements incorporated into the HACCP plan and/or supporting systems?	
Review customer complaints, all complaint dealt with in an appropriate manner? Procedures/HACCP plan reviewed in light of complaints received? Any necessary corrective action/preventative procedures put in place?	
Chemical Register up to date?	
Packaging Register up to date?	
Regular training for all product handlers carried out 3 monthly, records completed?	
Calibration of Hand-held or permanent Thermometers up to date?	
Calibration of scales due?	
Maintenance review of premises, plant, equipment, appliances etc.?	
Annual check of water reticulation up to date?	
Protective clothing, etc. in good order	
Any additional cleaning required in amenities, carton room, processing room, chillers, freezers	

Internal Audit Checks

Records Review

Item to Check	Status	Period Checked	Date Checked
Pre-Op & Daily Records			
Temperature Monitoring			
Vermin Control Records			
Water Monitoring Records			
CCP Monitoring			

Cleaning Verification

Item to Check	Status	Period Checked	Date Checked
Records			
Observation of cleaning procedure – all OK and as per programme?			

Reality Check

Observation	Status	Date Checked
Observation of processing activities		
Observation of company checker		
Review the labelling of product in process		
	Auditor/checker sign	

APPENDIX FIVE: Overseas Market Access Requirements

1. European Commission

1.0 FISHING VESSELS

Food business operators must ensure that:

1. Vessels used to harvest fishery products from their natural environment, or to handle or process them after harvesting, comply with the structural and equipment requirements laid down in Part 1.1.1; and
2. Operations carried out on board vessels take place in accordance with the rules laid down in Part 1.1.2.

1.1.1 STRUCTURAL AND EQUIPMENT REQUIREMENTS

A. Requirements for all vessels

1. Holds or other parts of the vessel where fishery products are stored must:
   i) be covered and self-draining
   ii) be well insulated
   iii) have provision for holding an acceptable quantity of ice or have alternative means of refrigeration
   iv) not contain objects or products liable to damage or transmit harmful properties and abnormal characteristics to the food.
2. Decks used for fish handling may be constructed of one or more of the following materials, namely surface-coated aluminium, fibreglass, timber coated with an epoxy (or similar) finish.

   Where fish does not normally come into contact with the deck and the timber is clean, sound and well caulked, timber is allowed on exposed decks.
3. Water used at any stage of handling / processing shall comply with the parameters of potable water, laid down in section 3.4 of these Standards or of clean seawater. Seawater intakes for vessels shall be located forward of any toilet or bilge discharge.
4. Containers and equipment in contact with the fishery products must be made of or coated with a material that is waterproof, resistant to decay, smooth and easy to clean and disinfect. When used they must be completely clean. Surface coatings must be durable and non-toxic.
5. When used, the section of vessels or the containers reserved for the storage of fishery product must be completely cleaned and, in particular, must not be capable of being contaminated by fuel used for the propulsion or bilge water.
6. After the fishery products have been unloaded the containers, equipment and sections of vessel that are directly in contact with the fishery products must be cleaned with potable water or clean water.
7. As soon as they are taken on board, fishery products must be protected from contamination and from the effects of the sun or any other source of heat. When they are washed, water used must be either potable water complying with the parameters set out in section 3.4 of these Standards or clean seawater, so as not to impair their quality or wholesomeness.
8. Fishery products shall be handled and stored in such a way as to prevent bruising. The use of spiked instruments shall be tolerated for the moving of large fish or fish that might injure the handler, provided the flesh of the products is not damaged.
9. Fishery products other than those kept alive must undergo chilling or freezing as soon as possible after landing.
10. Where fish are headed and/or gutted on board such operation must be carried out hygienically and products must be washed immediately and thoroughly with potable water or clean seawater. The viscera and parts, which may pose a threat to public health, must be removed

and set apart from products intended for human consumption. Livers and roes intended for human consumption must be chilled or frozen.

11. Staff assigned to handling fishery products shall maintain a high standard of cleanliness for themselves and all outer clothing.
12. Vessels must be designed and constructed so as not to cause contamination of the products with bilge-water, sewage, smoke, fuel, oil, grease or other objectionable substances.
13. Hydraulic circuits shall be protected in such a way as to ensure no oil leakage can contaminate products.
14. The working decks, the equipment and the holds, tanks and containers shall be cleaned and disinfected after each time they are used. Control and monitoring for the presence of pests shall be carried out regularly.
15. Cleaning products, disinfectants, insecticides and all potentially toxic substances shall be stored in a locked store or cupboard physically separated from fish cartons and ship to shore containers. Their use must not present any risk of contamination of fishery products.
16. Ice for chilling of fishery products must be used in such a way and in such quantities, so that fishery products will attain the temperature of melting ice as quickly as possible.
17. Fishing vessels that use seawater to wash up and process shall do so in uncontaminated waters and whilst the vessel is moving in open waters.

B. Requirements for vessels designed and equipped to preserve fresh fishery products for more than twenty-four hours

1. Vessels designed and equipped to preserve fishery products for more than twenty-four hours must be equipped with holds, tanks or containers for the storage of fishery products as follows:

   Frozen fishery products must be kept at a temperature of not more than -18ºC in all parts of the product; however, whole frozen fish in brine intended for the manufacture of canned food may be kept at a temperature of not more than -9ºC.

2. Holds must be separated from the engine compartments and from the crew quarters by partitions which are sufficient to prevent any contamination of the stored fishery products.

   Holds and containers used for the storage of fishery products must ensure their preservation under satisfactory conditions of hygiene and, where necessary, ensure that melt water does not remain in contact with the products.

3. In vessels equipped for chilling fishery products in cooled clean seawater, tanks must incorporate devices for achieving a uniform temperature throughout the tanks. Such devices must achieve a chilling rate that ensures that the mix of fish and clean seawater reaches not more than 3ºC 6 hours after loading and not more than 0 °C after 16 hours and allow the monitoring and, where necessary, recording of temperatures.

   Tanks must be equipped with adequate seawater filling and drainage installations and must incorporate devices for achieving uniform temperature throughout the tanks;

   After each unloading the tank's circulation systems and containers must be completely emptied and thoroughly cleaned using potable or clean seawater and should only be re-filled with clean seawater; and,

   The date and reference number of the tank must be clearly indicated on the temperature records. These must be kept and made available to the inspectorate.

4. Sanitary facilities including toilet and shower facilities shall be sufficient in number for the normal complement of crew. Any toilet must be equipped with a non-hand, non-elbow operated wash basins located in the toilet room or immediately outside the door.

C. Requirements for freezer vessels

Freezer vessels must:

1. have freezing equipment with sufficient capacity to lower the temperature rapidly so as to achieve a core temperature of not more than -18ºC;
2. freeze whole fish in brine intended for canning at -9°C or less
3. have refrigeration equipment with sufficient capacity to maintain fishery products in the storage holds at not more than -18ºC. Storage holds must be equipped with a temperature-recording device in a place where it can be easily read. The temperature sensor of the reader must be situated in the area where the temperature in the hold is the highest; and
4. meet the requirements for vessels designed and equipped to preserve fishery products for more than 24 hours laid down in Part B, paragraph 2.
5. Freezing machinery shall be physically separated from the hold in which frozen product is stored.
6. When brine-freezing, the brine shall not be a source of contamination.

D. Requirements for factory vessels

1. Factory vessels must have at least:
   (a) a receiving area reserved for taking fishery products on board, designed to allow each successive catch to be separated. This area must be easy to clean and designed so as to protect the products from the sun or the elements and from any source of contamination;
   (b) a hygienic system for conveying fishery products from the receiving area to the work area;
   (c) work areas that are large enough for the hygienic preparation and processing of fishery products, easy to clean and disinfect and designed and arranged in such a way as to prevent any contamination of the products;
   (d) storage areas for the finished products that are large enough and designed so that they are easy to clean. If a waste-processing unit operates on board, a separate hold must be designated for the storage of such waste;
   (e) a place for storing packaging materials that is separate from the product preparation and processing areas;
   (f) special equipment for disposing waste or fishery products that are unfit for human consumption directly into the sea or, where circumstances so require, into a watertight tank reserved for that purpose. If waste is stored and processed on board with a view to its sanitation, separate areas must be allocated for that purpose;
   (g) a water intake situated in a position that avoids contamination of the water supply; and
   (h) hand-washing equipment for use by the staff engaged in handling exposed fishery products with taps designed to prevent the spread of contamination.
2. However, factory vessels on board which crustaceans and molluscs are cooked, chilled and wrapped, need not meet the requirements of paragraph 1 if no other form of handling or processing takes place on board such vessels.
3. Factory vessels that freeze fishery products must have equipment meeting the requirements for freezer vessels laid down in Part C, points 1 to 6.

1.1.2 HYGIENE REQUIREMENTS

1. When in use, the parts of vessels or containers set aside for the storage of fishery products must be kept clean and maintained in good repair and condition. In particular, they must not be contaminated by fuel or bilge water.

2. As soon as possible after they are taken on board, fishery products must be protected from contamination and from the effects of the sun or any other source of heat. When they are washed, the water used must be either potable water or, where appropriate, clean water.
3. Fishery products must be handled and stored so as to prevent bruising. Handlers may use spiked instruments to move large fish or fish which might injure them, provided that the flesh of the products suffers no damage.
4. Fishery products other than those kept alive must undergo chilling as soon as possible after loading. However, when chilling is not possible, fishery products must be landed as soon as possible.
5. Ice used to chill fishery products must be made from potable water or clean water.
6. Where fish are headed and/or gutted on board, such operations must be carried out hygienically as soon as possible after capture, and the products must be washed immediately and thoroughly with potable water or clean water. In that event, the viscera and parts that may constitute a danger to public health must be removed as soon as possible and kept apart from products intended for human consumption. Livers and roes intended for human consumption must be preserved under ice, at a temperature approaching that of melting ice, or be frozen.
7. Where freezing in brine of whole fish intended for canning is practised, a temperature of not more than -9 °C must be achieved for the product. The brine must not be a source of contamination for the fish.

2.0 REQUIREMENTS DURING AND AFTER LANDING

1. Food business operators responsible for the unloading and landing of fishery products must:
   (a) ensure that unloading and landing equipment that comes into contact with fishery products is constructed of material that is easy to clean and disinfect and maintained in a good state of repair and cleanliness; and
   (b) avoid contamination of fishery products during unloading and landing, in particular by:
      (i) carrying out unloading and landing operations rapidly;
      (ii) placing fishery products without delay in a protected environment at the temperature specified in Section 7.0; and
      (iii) not using equipment and practices that cause unnecessary damage to the edible parts of the fishery products.
2. Food business operators responsible for auction and wholesale markets or parts thereof where fishery products are displayed for sale must ensure compliance with the following requirements.
   (a) (i) There must be lockable facilities for the refrigerated storage of detained fishery products and separate lockable facilities for the storage of fishery products declared unfit for human consumption.
      (ii) If the competent authority so requires, there must be an adequately equipped lockable facility or, where needed, room for the exclusive use of the competent authority.
   (b) At the time of display or storage of fishery products:
      (i) the premises must not be used for other purposes;
      (ii) vehicles emitting exhaust fumes likely to impair the quality of fishery products must not have access to the premises;
      (iii) persons having access to the premises must not introduce other animals; and
      (iv) the premises must be well lit to facilitate official controls.
3. When chilling was not possible on board the vessel, fresh fishery products, other than those kept alive, must undergo chilling as soon as possible after landing and be stored at a temperature approaching that of melting ice.

4. Food business operators must cooperate with relevant competent authorities so as to permit them to carry out official controls in accordance with the requirements given in the National Control Plan in particular as regards any notification procedures for the landing of fishery products that the competent authority of the Member State the flag of which the vessel is flying or the competent authority of the Member State where the fishery products are landed might consider necessary.

3.0 REQUIREMENTS FOR ESTABLISHMENTS, INCLUDING VESSELS, HANDLING FISHERY PRODUCTS

Food business operators must ensure compliance with the following requirements, where relevant, in establishments handling fishery products.

A. REQUIREMENTS FOR FRESH FISHERY PRODUCTS

1. Where chilled, unpackaged products are not distributed, dispatched, prepared or processed immediately after reaching an establishment on land, they must be stored under ice in appropriate facilities. Re-icing must be carried out as often as necessary. Packaged fresh fishery products must be chilled to a temperature approaching that of melting ice.
2. Operations such as heading and gutting must be carried out hygienically. Where gutting is possible from a technical and commercial viewpoint, it must be carried out as quickly as possible after the products have been caught or landed. The products must be washed thoroughly with potable water or, on board vessels, clean water immediately after these operations.
3. Operations such as filleting and cutting must be carried out so as to avoid contamination or spoilage of fillets and slices. Fillets and slices must not remain on the worktables beyond the time necessary for their preparation. Fillets and slices must be wrapped and, where necessary, packaged and must be chilled as quickly as possible after their preparation.
4. Containers used for the dispatch or storage of unpackaged prepared fresh fishery products stored under ice must ensure that melt water does not remain in contact with the products.
5. Whole and gutted fresh fishery products may be transported and stored in cooled water on board vessels. They may also continue to be transported in cooled water after landing, and be transported from aquaculture establishments, until they arrive at the first establishment on land carrying out any activity other than transport or sorting.

B. REQUIREMENTS FOR FROZEN PRODUCTS

Establishments on land that freeze fishery products must have equipment that satisfies the requirements laid down for freezer vessels in section 1.1.1-part C, points 1 and 2.

C. REQUIREMENTS FOR MECHANICALLY SEPARATED FISHERY PRODUCTS

Food business operators manufacturing mechanically separated fishery products must ensure compliance with the following requirements.

1. The raw materials used must satisfy the following requirements.
   (a) Only whole fish and bones after filleting may be used to produce mechanically separated fishery products;
   (b) All raw materials must be free from guts.
2. The manufacturing process must satisfy the following requirements:
   (a) Mechanical separation must take place without undue delay after filleting;
   (b) If whole fish are used, they must be gutted and washed beforehand;

(c) After production, mechanically separated fishery products must be frozen as quickly as possible or incorporated in a product intended for freezing or a stabilising treatment.

D. REQUIREMENTS CONCERNING PARASITES

1. The following fishery products must be frozen at a temperature of not more than -20 °C in all parts of the product for not less than 24 hours; this treatment must be applied to the raw product or the finished product:
   (a) fishery products to be consumed raw or almost raw;
   (b) fishery products from the following species, if they are to undergo a cold smoking process in which the internal temperature of the fishery product is not more than 60 °C:
      (i) herring;
      (ii) mackerel;
      (iii) sprat;
      (iv) (wild) Atlantic and Pacific salmon; and
   (c) marinated and/or salted fishery products, if the processing is insufficient to destroy nematode larvae.
2. Food business operators need not carry out the treatment required under paragraph 1 if:
   (a) epidemiological data are available indicating that the fishing grounds of origin do not present a health hazard with regard to the presence of parasites; and
   (b) the competent authority so authorises.
3. A document from the manufacturer, stating the type of process they have undergone, must accompany fishery products referred to in paragraph 1 when placed on the market, except when supplied to the final consumer.

4.0 REQUIREMENTS FOR PROCESSED FISHERY PRODUCTS

Food business operators cooking crustaceans and molluscs must ensure compliance with the following requirements.

1. Rapid cooling must follow cooking. Water used for this purpose must be potable water or, on board vessels, clean water. If no other method of preservation is used, cooling must continue until a temperature approaching that of melting ice is reached.
2. Shelling or shucking must be carried out hygienically, avoiding contamination of the product. Where such operations are done by hand, workers must pay particular attention to washing their hands.
3. After shelling or shucking, cooked products must be frozen immediately, or be chilled as soon as possible to the temperature laid down in Section 7.0.

5.0 HEALTH STANDARDS FOR FISHERY PRODUCTS

Food business operators must ensure, depending on the nature of the product or the species that fishery products placed on the market for human consumption meet the standards laid down in this Section.

A. ORGANOLEPTIC PROPERTIES OF FISHERY PRODUCTS

Food business operators must carry out an organoleptic examination of fishery products. In particular, this examination must ensure that fishery products comply with any freshness criteria.

B. HISTAMINE

Food business operators must ensure that the limits given in section 10.0 with regard to histamine are not exceeded.

C. PARASITES

Food business operators must ensure that fishery products have been subjected to a visual examination for the purpose of detecting visible parasites before being placed on the market.

They must not place fishery products that are obviously contaminated with parasites on the market for human consumption.

D. TOXINS HARMFUL TO HUMAN HEALTH

1. Fishery products derived from poisonous fish of the following families must not be placed on the market: Tetraodontidae, Molidae, Diodontidae and Canthigasteridae.
2. Fishery products containing biotoxins such as ciguatoxin or muscle-paralysing toxins must not be placed on the market.

6.0 WRAPPING AND PACKAGING OF FISHERY PRODUCTS

1. Receptacles in which fresh fishery products are kept under ice must be water-resistant and ensure that melt water does not remain in contact with the products.
2. Frozen blocks prepared on board vessels must be adequately wrapped before landing.
3. When fishery products are wrapped on board fishing vessels, food business operators must ensure that wrapping material:
   (a) is not a source of contamination;
   (b) is stored in such a manner that it is not exposed to a risk of contamination;
   (c) intended for re-use is easy to clean and, where necessary, to disinfect.

7.0 STORAGE OF FISHERY PRODUCTS

Food business operators storing fishery products must ensure compliance with the following requirements.

1. Fresh fishery products, thawed unprocessed fishery products, and cooked and chilled products from crustaceans and molluscs, must be maintained at a temperature approaching that of melting ice.
2. Frozen fishery products must be kept at a temperature of not more than -18ºC in all parts of the product; however, whole frozen fish in brine intended for the manufacture of canned food may be kept at a temperature of not more than -9ºC.
3. Fishery products kept alive must be kept at a temperature and in a manner that does not adversely affect food safety or their viability.

8.0 TRANSPORT OF FISHERY PRODUCTS

Food business operators transporting fishery products must ensure compliance with the following requirements.

1. During transport, fishery products must be maintained at the required temperature.
   In particular:
   (a) fresh fishery products, thawed unprocessed fishery products, and cooked and chilled products from crustaceans and molluscs, must be maintained at a temperature approaching that of melting ice;
   (b) frozen fishery products, with the exception of frozen fish in brine intended for the manufacture of canned food, must be maintained during transport at an even temperature of not more than -18ºC in all parts of the product, possibly with short upward fluctuations of not more than 3°C.
2. Food business operators need not comply with point 1(b) when frozen fishery products are transported from a cold store to an approved establishment to be thawed on arrival for the purposes of preparation and/or processing, if the journey is short and the competent authority so permits.
3. If fishery products are kept under ice, melt water must not remain in contact with the products.

4. Fishery products to be placed on the market live must be transported in such a way as not adversely to affect food safety or their viability.

9.0 PACKAGING AND LABELLING OF SEAFOOD PRODUCTS

Requirements for labelling are to be based on EU Regulation 1169/2011 and EU Regulation 1379/2011 on labelling, presentation and advertising of foodstuffs to the final consumer. The aim of this legislation is to ensure that the consumer gets all the essential information as regards the composition of the product, the manufacturer, methods of storage and preparation, etc.
Plastic packaging shall meet the requirements of Regulation 10/2011.

Reference and updates for labelling is to be found at
http://ec.europa.eu/food/food/labellingnutrition/foodlabelling/comm_legisl_en.htm

Please note the information supplied below is a summary only – the EU legislation should be referred to in entirety to provide further detailed information if required.

General

Fish and fish products may only be marketed in the European Union if packages contain the following information (not necessarily in this order):

(1) the name under which the product is sold;
(2) the list of ingredients or processing aids (if applicable)
(3) the list of any ingredients that may cause allergic reactions (if applicable) and including cereals,
(4) scientific name of the fish
(5) the production method (wild caught, caught in fresh water or farmed)
(6) the area from which the product was caught or farmed (3-digit FAO catch area)
(7) the category of fishing gear
(8) the date of production
(9) whether the product has been defrosted
(10) the net weight or quantity
(11) the date of minimum durability as a “USE BY” or “BEST BEFORE” date
(12) any special storage conditions or conditions of use
(13) the name or business name and address of the manufacturer or package of
the country of origin
(14) instructions for use in situations where absence of instructions might cause problems in use

Frozen unprocessed product

In the case of frozen unprocessed product labels should contain the information given in the general section previously given plus the following:

a. the date of freezing or the date of first freezing in situations where the product is frozen more than once
b. the date of freezing shall be preceded by “Frozen on.”
c. The date should consist at least of day, month and year in un-coded situations

NOTE: The lot is defined by the processor in order to be able to trace a product history in case of a problem. It can be the production date.

Canned product

a. Product name
b. Country of origin
c. Net weight (in grams for solids and litres for liquids)
d. Net drained weight
e. List of ingredients (added water is an ingredient)
f. Date on minimum durability (year)
g. Any special storage instructions or conditions of use
h. Instructions for use (if not obvious)
i. Name and address of the manufacturer (or seller in the EU)
j. Licence number of processor or packer

10.0 SAMPLING AND TESTING OF FISH AND FISHERY PRODUCTS

General

(I) ORGANOLEPTIC SAMPLING AND TESTING

Application. This section applies to white fish received as specified in EU Council Regulation No. 2406/96

Criteria				
	Freshness Ratings			
Part of fish inspected	**3**	**2**	**1**	**0**
Appearance				
Skin	Bright pigmentation, bright, shining iridescent colours; clear distinction between dorsal and central surfaces	Loss of lustre and shine; duller colours; less difference between dorsal and ventral surfaces	Dull, lustreless, insipid colours; skin creased when fish curved	Very dull pigmentation; skin coming away from flesh
Skin mucus	Aqueous, transparent, mucus	Slightly cloudy mucus	Milky mucus	Yellowish grey, opaque mucus
Eyes	Convex, bulging; blue-black bright pupil, transparent 'eyelid'	Convex and slightly sunken; dark pupil; slightly opalescent cornea	Flat; blurred pupil; blood seepage around the eye	Concave in the onecentre; grey pupil; milky cornea
Gills	Uniformly dark red to purple. No mucus	Less bright colour, paler at edges. Transparent mucus	brown/grey and bleached; mucus opaque and thick	brown or bleached; mucus yellowish grey and clotted
Gills cover	Silvery,	Silvery, slightly red or	Brownish and extensive seepage of blood from vessels	Yellowish
Smell (of gills and abdominal cavity)	Seaweedy	No small of seaweed, neutral smell	Fermented slightly sour,	Rotten
Flesh (cut from abdomen)	Bluish, translucent, smooth, shining	Velvety, waxy, dull	Slightly opaque	Opaque

	No change in original colour	Colour slightly changed		
Flesh(texture)	Firm and elastic Smooth surface	Less elastic	Slightly soft (flaccid), less elastic Waxy (velvety) and dull surface	Soft (flaccid) Scales easily detached from skin, surface rather wrinkled, inclining to mealy

Operators shall develop a sampling plan to check the relevant species/products prior to export and demonstrate compliance with this requirement.

Once the freshness grading has been determined the operator shall label this clearly and indelibly in print of not less than 5 cm on labels affixed to the lot being exported.

(II) SIZE RATING

Albacore and bigeye tuna shall also be rated for size according to the table given below:

Species	***Size***	***Kg/fish***	***Number of fish/kg***	***Region***	***Geographical area***	***Minimum Size***
Albacore tuna *(Thunnus albacore)*	1 2	4 and over 1.5 to 4				
Bigeye tuna (*Thunnus obesus)*	1 2	10 and over 3.2 to 10				

Lots shall be placed in size categories in accordance with the scale given above. Each lot must contain products of the same size category.
The size category and presentation shall be clearly and indelibly marked in characters which are at least 5 cm in height, on labels affixed to the lot.

The net weight in kilograms shall be clearly and legibly marked on each lot.

(III) HISTAMINE SAMPLING

For fish species of the families: Scombridae, Clupeidae, Engraulidae, Ponatomidae, Scombresosidae and Coryphaenidae. Sampling criteria: Based on 9 samples, the mean value must not exceed 100 ppm, but 2 samples may exceed 100 ppm but no one (1) sample may exceed 200 ppm. (Commission Regulation 1441/2007) Sample would mean fish of the same species from the same lot. (Note: A samples shall be fish of the same species from the same lot).

(IV) Poisonous fishery products

The following species of poisonous fishery products are prohibited;
Species of *Tetraodontidae, Molidae, Diodontidae, Canthigastridae* or other known toxic species.

Species of family *Gempylidae* (Oilfish-*Ruvettus pretiosus* and Escolar-*Lepidocybium flavobrunneum*) may only be placed in the market in wrapped packed form and must be properly labelled.

(V) Freshness Indicator

TVB-N (Regulation (EC) 2074/2005): Laying down implementing measure for certain products as regards implementing measures for certain products of animal origin intended for human consumption and repealing certain implementing measures.

(1). Unprocessed fishery products belonging to the species stated below shall be regarded as unfit for human consumption where organoleptic assessment has raised doubts as to their freshness and chemical checks reveal that the following TVB-N limits are exceeded:

(a) 25 mg of nitrogen/100 g of flesh for the Sebastes spp., Helicolenus dactylopterus, Sebastichthys capensis
(b) 30 mg of nitrogen/100 g of flesh for the Species belonging to the Pleuronectidae family (with the exception of halibut: Hippoglossus spp.).
(c) 35 mg of nitrogen/100 g of flesh for the species Salmo salar, species belonging to the Merlucciidae family, species belonging to the Gadidae family.

(2) The CA and company likewise will carry out TVB-N and TMA-N when organoleptic assessment raised doubts as to the freshness of fish. (Now incorporated into Industry standard).

(VI) Heavy Metals

Mercury
(Regulation (EC) 1881/2006(Amended by EU Regulation 1126/2007& Commission Regulation 333/2007).

Analysis for mercury is performed on a homogenised mixture of the sample.

A) A tolerance of 1.0 ppm total mercury, in edible tissue based on 1sample/100mt or 1 sample /100 if less to be taken from different individual fish representative of the lot. Tolerance level are set for the following species:

Product	Max Limits	Methods of analysis
Sharks(all species)	.5ppm	LOD less than a tenth of the permissible limit LOQ less than one fifth of the permissible level
Tuna *Thunnus spp,)*	*1.0ppm*	
Little tuna *(Euthynnus spp,)*		
Bonito *(Sarda spp,)*		
Plain bonito*(Orcynopsis unicolor)*		
Swordfish *(Xiphias gladius)*		
Sailfish *(Istiophorus platypterus)*	*.5ppm*	
Marlin *(Makaira spp,)*		
Bass *(Dicentrarchus labrax)*		
Portuguese dogfish *(Centroscymnes coelolepis*		
Rays *(Raja spp,)*		
Emperor or Orange roughy *(Hoplostethus atlanticus)*		
Bonito *(Sarda sarda)*		
Grenadier *(Coryphaenoides rupestris)*		
Plain bonito *(Orcynopsis unicolor)*		
Snake mackerel or Butterfish *(Lepidocybium flavobrunneum, Ruvettus pretiosus, Gempylus serpens)*		

B) A tolerance of 0.5 ppm total mercury, in edible tissue, based on tissue based on 1sample/100mt or 1 sample /100 if less to be taken for each species of fish.

(VII) Lead

(Regulation (EC) 1881/2006 (Amended by EU Regulation 1126/2007& Commission Regulation 333/2007)

Product	Max Level (ppm)	Method of Analysis
Muscle meat of fish	0.3	LOD less than a tenth of the permissible limit LOQ less than one fifth of the permissible level
Crustaceans, excluding brown meat of crab	0.5	N/A
Cephalopods (without viscera)	1.0	
Bivalve molluscs	1.5	

(VIII) Cadmium

Cadmium (Regulation (EC) 1881/2006): (Amended by EU Regulation1126/2007&Commission Regulation 333/2007

Product	Max level (ppm)	Method of Analysis
Muscle meat of fish, excluding those listed below	0.05	LOD less than a tenth of the permissible limit

		LOQ less than one fifth of the permissible level
Muscle meat of: bonito (*Sarda sarda*), horse mackerel or scad (*Trachurus, trachurus*), sardine (*Sardina pilcardus*), sardinops (*Sardinops species*), spotted seabass (*Dicentrarchus punctatus),* tuna (*Thunnus* species and *Euthynnys* species)	0.1	
Crustaceans, excluding brown meat of crab and excluding head and thorax meat of lobster and similar large crustaceans (Nephropidae and Palinuridae)	0.5	
Cephalopods (without viscera)	1.0	
Muscle meat of swordfish *(Xiphias gladius)*	0.30	

(IX) Dioxin and Benzo (a) pyrene

Regulation 1881/2006(Amended by EU Regulation 1126/2007&Commission Regulation 333/2007) High levels of Dioxin and PCBs are very unlikely in the species exported, as referenced on: "Background note on EFSA risk assessment related to the safety of wild and farmed fish (Request N° EFSA- Q-2004-23) July,2005.
http://www.efsa.europa.eu/etc/medialib/efsa/press_room/questions_and_answers/1015.Par.0001.File.dat/qa_contam_swaff_en1.pdf

Maximum limits for Dioxins

Fishery products	Sum dioxins (WHO-PCDD/F-TEQ)	Sum dioxins and dioxin-like PCBs (WHO-PCDD/F-PCB-TEQ)	Sum of PCB 28/52/101/138/153/180
Muscle meat of fishery products excluding eel	3.5 pg/g wet weight	6.5 pg./g wet weight	75ng/g wet weight

Benzo (a) pyrene are in a similar situation due to the low level of Polycyclic Aromatic Hydrocarbons (PAH) in the open seas around RMI

Maximum limits for Benzo (a) pyrene

Fishery products	Benzo(a)pyrene (mg/kg)	**Method of Analysis**
Muscle meat of fish, other than smoked fish	2	LOD less than 0.3 ug/kg LOQ less than 0.9 ug/kg
Crustaceans, cephalopods other than smoked fish	5	
	Benzo(a)pyrene	Sum of benzo(a) pyrene, benz(a) anthrancene, benzo (b) flooroethene, chrysene
Muscle meat of fish other than smoke fish	2.0 ug/kg	LOQ less than 0.9ug/kg LOD less than 0.3ug/kg
Muscle of smoke fish	5.0 ug/kg	

(X) Inorganic Tin

Canned foods including canned fish must not exceed 200ppm
This is not applicable to the Republic of the Marshall Islands Competent Authority for exports..
There is no canned production at this stage.

2. Other Importing Country Requirements

(1) Requirement for this are stipulated in the Fish Processing and Export Regulations.

(2) Elements of this standard will also apply as required by the deemed relevant by the Competent Authority.

(4) More information on exports to other markets be obtained from the Competent Authority.

APPENDIX SEVEN: F13 Corrective Action Request

F13 - Corrective Action Request

Name of the establishment:					**Approval Number:**					
Verification Officers:					**Representatives of the establishment:**					
Source Verification Record:					**Date of Verification:**					
Non-conformity					**Closeout**					
Mi/ma /Se/ Cr	**FO Ref**	**IS Ref**	**Issue**	**Required action**	**Timeframe**	**Yes/No?**	**Extension? And reason**	**Comments**	**Signature**	**Date/Time**

Verifiers name and signature
Date/Time:

Representative name and signature [3]
Date/Time:

[i] RMI Environmental Protection Authority, - WHO and RMI Public Drinking Water Standards

[3] Representative of the establishment accepting results of evaluation